

TABLE OF CONTENTS

Jervis B. Webb Site

5030 Firestone Blvd, South Gate, CA 90280

PCA Code: 11 series (11050, etc.) Site Code: 301286-00

Todd Wallbom Project Manager (as of January 2007; former Project Manager was Pete Cooke)

<u>Date</u> (yy,mm,dd)	<u>Letter/Activity/Contact</u>
1996-12-17	1. LACDPW issues certification of tank closure (underground sumps).
1997-01-16	2. Document by EKI. "Request for Reassessment of the Jervis B. Webb Company of California"
1997-02-27	3. Letter from USEPA to Jervis Webb (JW). Responding to RP request dated 1997-01-16 to de-list Rayo parcel from CERCLIS, as UST closure is complete. USEPA says to sample Rayo and Firestone parcels for VOCs.
1997-10-xx	4. Consultant for JW(EKI) soil investigation
1997-12-01	5. Soil gas survey performed.
1998-02-02	6. Cost Recovery letter from LARWQCB to JW. Indicates site was once used as a rivets factory. Soil impacted by PCE, TCE and other VOCs.
1998-02-18	7. Document by EKI. Phase II.
1998-02-19	8. Letter from EKI to LARWQCB. Cover letter for submittal of Phase II and other background documents.
1998-02-19	9. Letter from EKI to LARWQCB. Indicates EKI's October 1997 soil investigation. Indicates a meeting between at least EKI and LARWQCB took place on 1998-02-06. Letter conveys GW investigation WP, calling for three wells.
1998-02-25	10. Three GW monitoring wells installed.
1998-06-30	11. Document by EKI. Phase II GW IR.
1998-08-25	12. Letter from LARWQCB to JW. Annual Estimation of charges. Indicates quarterly GW monitoring plan is expected.
1998-09-04	13. Letter from LARWQCB to JW. Response to Phase II GW IR dated 1998-06-30. Three on-site and two off-site wells sampled. Directed to begin quarterly monitoring and determine extent of VOC plume.
1998-09-29	14. Letter from EKI to LARWQCB. WP for additional GW investigation including hydropunch, "push in plastic piezometer" and at least one more GW well. Begin quarterly GW monitoring. Propose to remove clarifier. Propose to submit WP for soil remediation.
1998-10-21	15. Letter from EKI to LARWQCB. Transmittal of results of additional GW investigation, proposal to install two new GW wells.

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- 1999-01-13 16. Document by EKI. Additional GW Investigation and Quarterly Monitoring for fourth quarter 1998.
- 1999-04-14 17. Document by EKI. WP for Clarifier Removal and Soil Remediation via SVE. Report indicates vadose zone has a 1-5' clay layer at 25' bgs. GW at 45' bgs. Upper and lower vadose zones impacted with VOCs, primarily PCE and TCE.
- 1999-05-18 18. Letter from LARWQCB to JW. Approves WP dated 1999-04-14 with modifications, also once again requesting quarterly GW monitoring to start.
- 1999-06-01 19. Clarifier excavated.
- 1999-06-04 20. Document by EKI. Quarterly Progress Report, first quarter 1999.
- 1999-06-28 21. Letter from EKI to LARWQCB. GW monitoring plan.
- 1999-07-30 22. Document by EKI. Quarterly Progress Report, second quarter 1999.
- 1999-10-15 23. Document by EKI. Quarterly Progress Report, third quarter 1999.
- 2000-02-04 24. Document by EKI. Quarterly Progress Report, fourth quarter 1999.
- 2000-03-16 25. Dual-depth SVE system started..
- 2000-04-28 26. Document by EKI. Quarterly Progress Report, first quarter 2000.
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- 2000-09-18 28. Letter from LARWQCB. Comments on Quarterly Progress Report. Requires submittal of WP to fully delineate GW contamination.
- 2000-10-26 29. Document by EKI. Quarterly Progress Report, third quarter 2000.
- 2000-11-30 30. Document by EKI. WP for GW remediation.
- 2001-02-05 31. Document by EKI. Quarterly Progress Report, fourth quarter 2000. Request of NFA for soil.
- 2001-05-01 32. Document by EKI. Quarterly Progress Report, first quarter 2001.
- 2001-05-22 33. Document by Dragun Corp. GW and Soil Evaluation Report. Conclusion is that GW contamination is from off site. JW seeking site closure.
- 2001-06-25 34. Document by IT Group. WP for Soil Closure.

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- 2001-07-24 36. Document by EKI. Quarterly Progress Report, second quarter 2001.
- 2001-07-31 37. Letter from EKI to LARWQCB. Request for reduction in GW monitoring frequency.
- 2001-08-14 38. Letter from LARWQCB to JW. Approval of Soil Closure Report and Addendum. Added some sampling, including some for CAM metals and Cr6. Indicates that risk assessments are needed and to be approved by OEHHA or DTSC.
- 2001-10-03 39. Document by IT Group. Soil Closure Report
- 2001-10-xx 40. SVE system turned off (see 2003-03-16). Approximately 177 pounds of VOCs removed, primarily TCE.
- 2001-11-08 41. Letter from LARWQCB to JW. GW sampling reduced from quarterly to semi-annually, must sample for VOCs and metals.
- 2001-12-12 42. Letter from LARWQCB to JW. Denies soil closure. Cites multiple elevated concentrations for TCE and Cr6.
- 2002-01-07 43. LARWQCB Case Study Form. Structured summary in LARWQCB green folder. Staff recommends NFA for soil.
- 2002-01-23 44. LARWQCB letter to JW. NFA for soil.
- 2002-02-28 45. Letter from IT Group to LARWQCB. Request to Modify GW Sampling Methodology with Semi-Annual GW Monitoring Report.
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Do GW VOC concentrations suggest DNAPL?
- 2002-07-30 47. Document by Brown & Caldwell. Semi-Annual GW Sampling Report.
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- 2004-07-22 50. Document by Brown & Caldwell. Annual GW Sampling Report.
- 2005-07-28 51. Document by Brown & Caldwell. Annual GW Sampling Report. Report states that GW sampling is no longer necessary and states that GW sampling is discontinued.

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5030 Firestone Blvd, South Gate, CA 90280

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Todd Wallbom Project Manager (as of January 2007; former Project Manager was Pete Cooke)

<u>Date</u> (yy,mm,dd)	<u>Letter/Activity/Contact</u>
1996-12-17	1. LACDPW issues certification of tank closure (underground sumps).
1997-01-16	2. Document by EKI. "Request for Reassessment of the Jervis B. Webb Company of California"
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Request ID: 10000920

SUPPORT SERVICES REQUEST FORM

APPROVED BY SAYAREH AMIREBRAHIMI ON 03/08/2007

Support Services Request for: Office of Legal Counsel (OLC)

Date: 03/08/2007

Requestor: Todd Wallbom **Phone:** **Fax:** **Email:** twallbom@dtsc.ca.gov

Requestor's Sup: JENNIFER JONES **DTSC:** DTSC - CLEANUP OPERATIONS DIVISION - GLENDALE

Project Manager: Todd Wallbom **Phone:** **Fax:** **Email:** twallbom@dtsc.ca.gov

Project Name: Jervis Webb

Project Location: 9301 Rayo Ave.

City: South Gate

Zip: 90280

Site Code: 301286-00

Work Phase: 00

PCA Code: 11045

Document Title: Consent

Document Type: Consent Order

Services Requested: Please review and edit the draft Imminent and Substantial Endangerment Determination and Consent Order (Consent Order) named against the Jervis Webb Company.

Output Level:

- ☒ Memo to requestor (plus electronic copy)
☐ Letter to report author via requestor (plus electronic copy)
☐
☒ Telephone conference with requestor, report author, etc.
☐ Travel to meeting for discussion

Proposed Response Date: 03/22/2007

Estimated Work Hours: 10

Time Pressure (before the rain, Governor's visit, etc.): None

Name(s) of Support Services Review staff with previous work on this project: Bob Elliott

TO BE COMPLETED BY SUPPORT SERVICES REVIEW STAFF

Log Number: _____

Date Assigned: _____

Staff Assigned: _____

Phone: _____

Actual Work Hours: _____

Supervisor: _____

Phone: _____

Completed Date: _____

Comments/Notes: _____

Jerris Webb South Gate drive to Freestone
on hand off and to 710.
Chronology sent. 'M' does
Jerris Webb.

no longer own the site
sold and everything stopped
see - next to Copper Drum, no gradient.
need a fox and senior goo (word - w/
Copper Drum)

Parent wells on site.

complex hydroge issues, high cones (DNAPLs)

No changes in CW VCR since they began monitoring.
change to annual monitoring (2005) but

Soil gas and soil. Begins lawsuit claim the
soil issue, should they?

check to see if they meet EPA 505.

We can re-open the site.

SVE to acceptable levels as to the Regional

Board Board.

* Hold a meeting with the RPs and
for property owners.

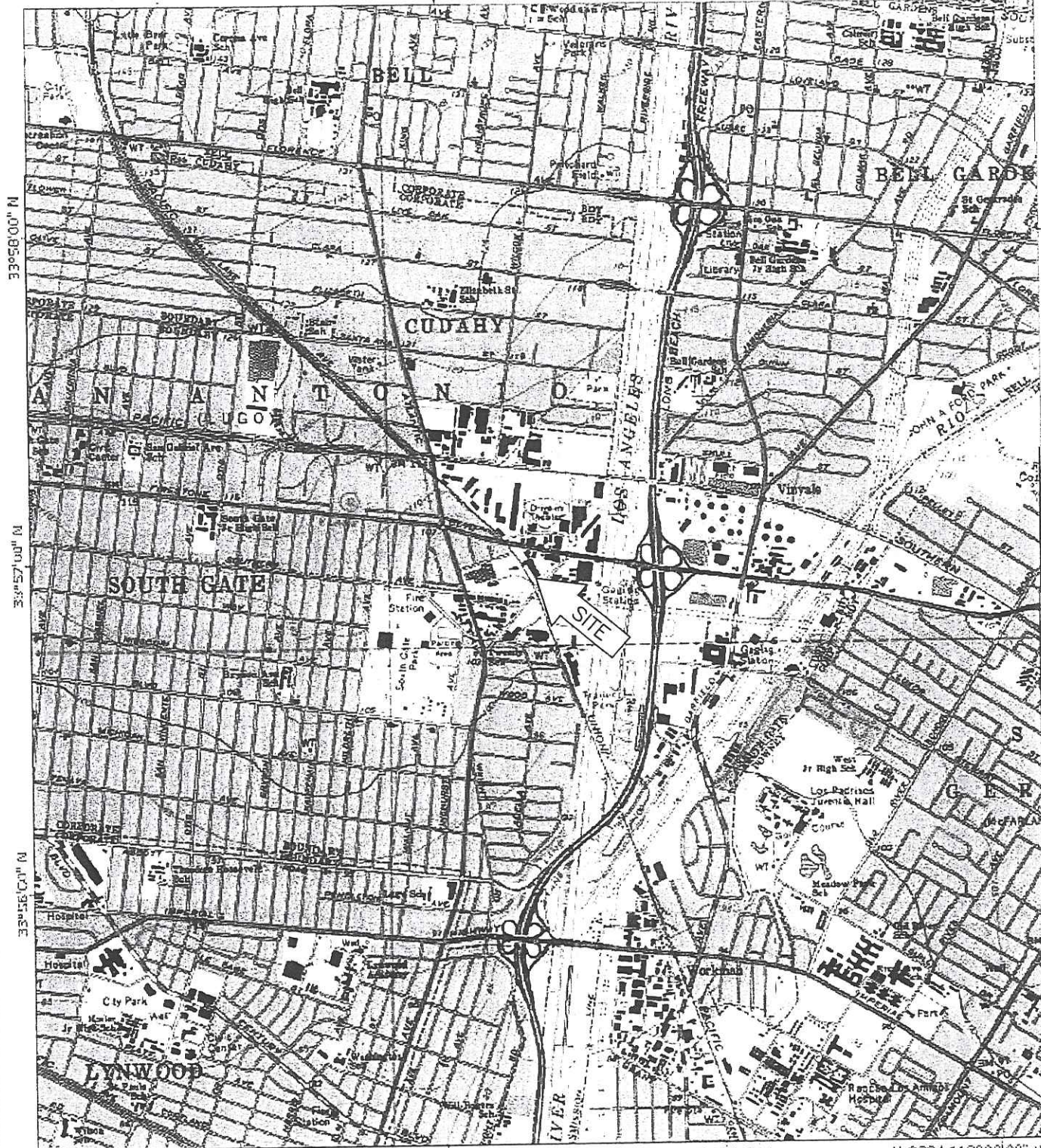
Location: 33°56'58" N, 118°10'40" W WGS84

118°12'00" W

118°11'00" W

118°10'00" W

WGS84 118°09'00" W



Map created with TOPOIG 2001 National Geographic (www.nationalgeographic.com/topo)

DATE
JULY 2004

PROJECT NUMBER
22946

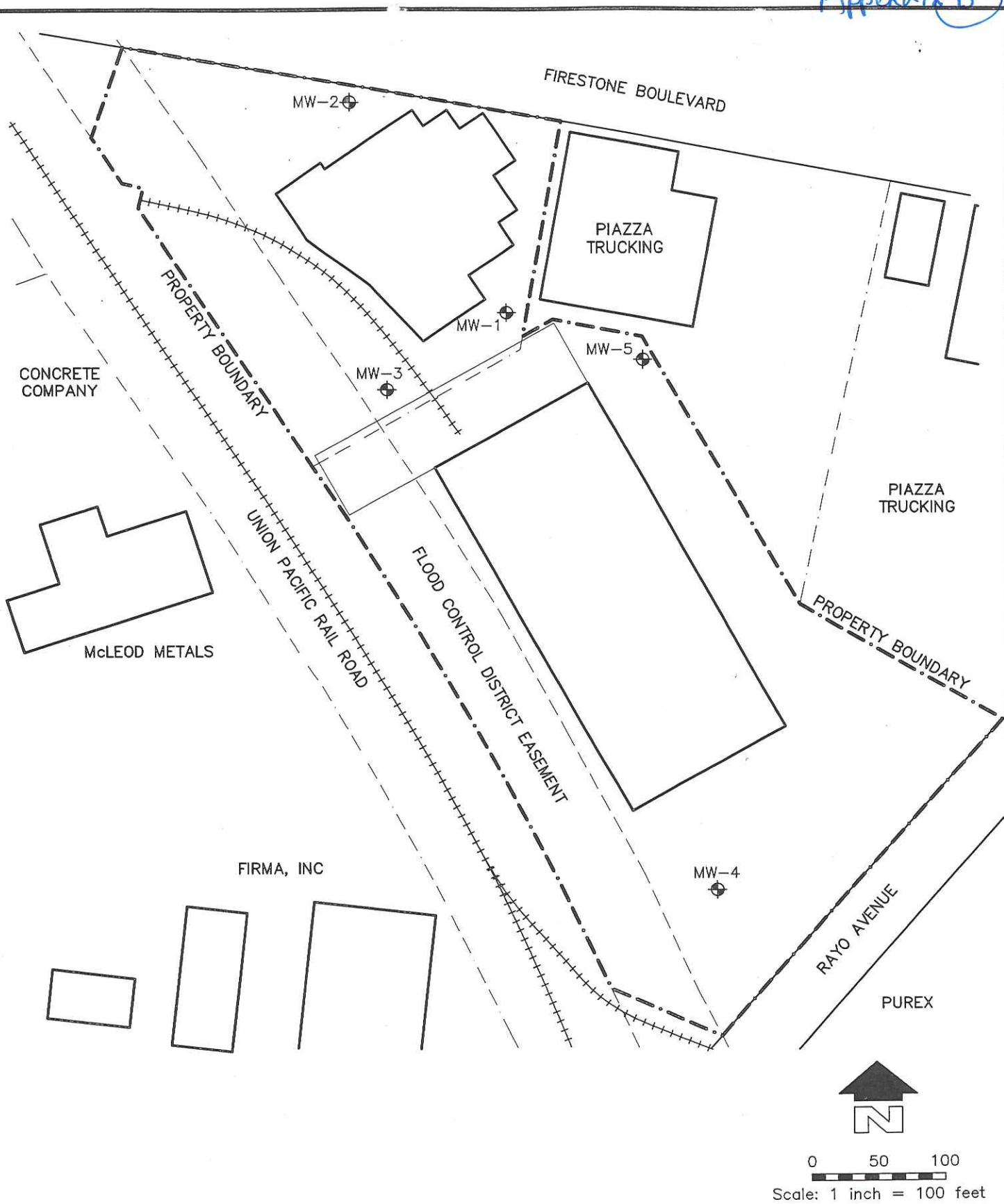
**BROWN AND
CALDWELL**
IRVINE, CALIFORNIA

SITE LOCATION

PROJECT
LOCATION

JERVIS B. WEBB COMPANY OF CALIFORNIA
5030 FIRESTONE BOULEVARD/9301 RAYO AVENUE
SOUTH GATE, CALIFORNIA

FIGURE
1



DATE JULY 2004	PROJECT NUMBER 22946	SITE PLAN	
BROWN AND CALDWELL IRVINE, CALIFORNIA		PROJECT LOCATION JERVIS B. WEBB COMPANY OF CALIFORNIA 5030 FIRESTONE BOULEVARD/9301 RAYO AVENUE SOUTH GATE, CALIFORNIA	FIGURE 2



California Regional Water Quality Control Board

Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award from Keep California Beautiful*

Alan C. Lloyd, Ph.D.
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

RECEIVED

MAY 01 2006

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
Southern California Site
Mitigation Branch

April 19, 2006

Ms. Sayareh Amirebrahimi, Branch Chief
Site Mitigation Branch
State Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale CA 91201-2205

TRANSFER OF JERVIS WEBB AND L. A. CHEMICAL COMPANY SITES TO THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL, GLENDALE, CALIFORNIA

Dear Ms. Amirebrahimi,

Pursuant to your discussion with Mr. David Bacharowski, we are transferring the above referenced cases to your agency. We understand that for these two cases – Jervis Webb, located at 5030 Firestone Boulevard in South Gate, and L. A. Chemical Company, located at 4545 Adrian Street in Southgate - your agency will assume lead oversight responsibilities.

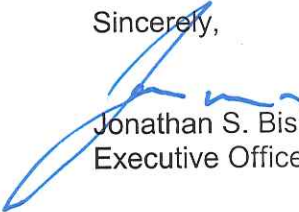
With regard to a permit for pilot testing of an in-situ cleanup at the Cooper Drum site, located near Jervis Webb, we have been informed by contractors for the USEPA that injection has already occurred under the USEPA's Superfund authority, and that Waste Discharge Requirements from the Regional Board are not needed.

We are delivering with this letter our files for these cases. Please be advised that these files are our complete records for these facilities. Due to space limitations, we have not made copies of any of the documents within the files, and we are relying upon your agency to maintain and preserve them in accordance with the Public Records Act and your agency's records retention requirements.

We assume you want us to notify the responsible parties regarding the change in Lead Agency regulatory oversight for these facilities. Please let us know when you are ready for us to do so. We can notify them by our letter alone or by joint letter if you prefer.

We would be pleased to assist you as you assume oversight responsibilities for these cases. If you have any questions or would like to meet and discuss the status of the cases, please contact Mr. David Bacharowski at (213) 576-6607.

Sincerely,


Jonathan S. Bishop
Executive Officer

California Environmental Protection Agency



Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Ms. Sayareh Amirebrahimi

- 2 -

April 19, 2006

Enclosures: (1) Two File Boxes for Jervis Webb site (2) Two File Boxes for L. A. Chemical Company and (3) One File Box for Cooper Drum Site.

Cc: Mr. Keith Takata, USEPA, Region 9, San Francisco
Ms. Elizabeth Adams, USEPA, Region 9, San Francisco
Ms. Marie Rongone, USEPA, Region 9, San Francisco
Ms. Karen Baker, California Department of Toxic Substances Control, Cypress

California Environmental Protection Agency



Recycled Paper

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California Regional Water Quality Control Board

Los Angeles Region



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Arnold Schwarzenegger
Governor

April 10, 2006

Ms. Sayareh Amirebrahimi, Branch Chief
Site Mitigation Branch
State Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201-2205

TRANSFER OF JERVIS WEBB AND PMC SPECIALTY GROUP SITES TO THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL, GLENDALE, CALIFORNIA


Dear Ms. Amirebrahimi:

Per your discussion with Mr. David Bacharowski, we are transferring the above referenced cases to your agency. We understand that for these two cases -- Jervis Webb, located at 5030 Firestone Boulevard in South Gate, and PMC Specialty Group, located at 10051 Romandel Avenue in Santa Fe Springs, your agency will assume lead oversight responsibilities.

With regard to a permit for in-situ cleanup of the Cooper Drum site, located near Jervis Webb, we have been informed by contractors for the US EPA that injection has already occurred, under the US EPA's Superfund authority, and that Waste Discharge Requirements from the Regional Board are not needed.

Our files for these cases are enclosed. We would be pleased to assist you as you assume oversight responsibilities for these cases. If you have any questions or would like to meet and discuss the status of these cases, please contact Mr. Mohammad Zaidi at (213) 576-6732, or Unit Chief Dr. Kwangil Lee, at (213) 576-6734.

Sincerely,


Jonathan S. Bishop
Executive Officer

Enclosures: (1) Two File Boxes for Jervis Webb site (2) One File Box for PMC Specialty site (3) One File Box for Cooper Drum site

cc:

Mr. Keith Takata, USEPA, Region 9, San Francisco
Ms. Elizabeth Adams, USEPA, Region 9, San Francisco
Ms. Marie Rongone, USEPA, Region 9, San Francisco
Ms. Karen Baker, California Department of Toxic Substances Control, Cypress

California Environmental Protection Agency



Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations

CASE REVIEW FORM

Case Reviewer: Steven Hariri	Unit Chief: Rebecca Chou	Section Chief: Arthur Heath	Division Chief: AB681	EO: Dennis Dickerson
Date: January 7, 2002		SLIC file no.: 744		Case reviewer: Steven Hariri Signature: <i>[Signature]</i>
Site Name/Address: Jervis B. Webb 5030 Firestone Boulevard South Gate, CA 90280		Responsible parties: Jervis B. Webb		Address: 34375 West Twelve Mile Road Farmington Hills, MI 48331-5624 Phone no.: (248) 553-1000

I. CASE INFORMATION

Area of Concern	Contaminant Source	Chemicals of Concern	Source Status	Date of Action
Site	Rivet Manufacturing (leaking clarifier) and Conveyor Facility (USTs and Piping)	Chlorinated Solvents, Petroleum Hydrocarbons and Metals	UST Removal and Excavation, Soil Vapor Extraction and Reaming Out of Residual Contamination	10/18/96 and 3/16/00 to 12/14/01

II. SITE CHARACTERIZATION INFORMATION

GW Basin: Central Basin	Beneficial uses: MUN, IND, PROC, AGR	Depth to drinking water aquifer: Based on the closest groundwater monitoring well located 1,200 feet northwest, the first drinking water aquifer encountered is located at approximately 500 feet below ground surface.		
Distance to nearest municipal supply well: 1,200 feet		Distance between known shallow GW contamination and drinking water aquifer: 460 feet		
GW highest depth: 42 ft	GW lowest depth: 46 ft	Well screen interval: 40 - 70	Flow direction: Regional to the South	
Soil types: Clay, silt and sand.	Max soil depth sampled: 53.5 ft	AB681 Notification: <input checked="" type="checkbox"/> yes <input type="checkbox"/> no The responsible party is the owner.	Adjacent to school: <input type="checkbox"/> yes <input checked="" type="checkbox"/> no	

III. MAXIMUM DOCUMENTED CONTAMINANT CONCENTRATIONS IN SOIL

Contaminant	Soil (mg/Kg)		PRGs		Soil Screening Level (mg/Kg)	Contaminant	Soil (mg/Kg)		PRGs		Soil Screening Level (mg/Kg)
	Earliest (1996-1999)	Latest (2001)	Residential (mg/Kg)	Industrial (mg/Kg)			Earliest (1996-1999)	Latest (2001)	Residential (mg/Kg)	Industrial (mg/Kg)	
TCE	270	0.067	2.8	6.1	0.045 ^a	Beryllium	<0.54	0.57	150	2,200	4 ⁱ
PCE	140	0.039	5.7	19	0.045 ^b	Cadmium	8.3	0.6	9	810	5 ^m
1,1-DCA	0.052	<0.001	3.3	7.1	0.011 ^c	Chromium	7,300	74	210	450	50 ⁿ
1,1,1-TCA	0.300	<0.001	630	1,400	0.200 ^d	Chromium VI	0.88	0.24	0.2	64	50 ⁿ
TRPH	280	N/T	N/A	N/A	10,000 ^e	Cobalt	150	14	4,700	100,000	4,700 ^o
Benzene	0.005	<0.001	0.65	1.5	0.011 ^f	Copper	850	5.3	2,900	76,000	1,300 ^p
Toluene	0.012	<0.001	520	520	0.3 ^g	Lead	31,000	25	400	750	15 ^q
TPH (C5-C10)	0.14	<0.1	N/A	N/A	500 ^h	Mercury	1.7	2.5	23	610	2 ^r
TPH (C10-20)	6,900	1,800	N/A	N/A	1,000 ^h	Molybdenum	140	<1	390	10,000	390 ^s
TPH (C20-30)	29,000	16,000	N/A	N/A	10,000 ^h	Nickel	72	16	150	41,000	100 ^t
Antimony	360	<2	31	820	6 ⁱ	Vanadium	50	50	550	14,000	550 ^u
Arsenic	26	7.9	0.39	2.7	50 ^j	Zinc	1,200	73	23,000	100,000	5,000 ^v
Barium	2,700	170	5,400	100,000	1,000 ^k						

N/T - Not tested

N/A - Not applicable

- Soil screening levels based on a groundwater depth of 40 feet and sand, silt and clay soil matrix with a distance of 15 feet above groundwater.
- Soil screening levels based on a groundwater depth of 40 feet and sand, silt and clay soil matrix with a distance of 15 feet above groundwater.
- Soil screening levels based on a groundwater depth of 40 feet and sand, silt and clay soil matrix with a distance of 10 feet above groundwater.
- Soil screening levels based on a groundwater depth of 40 feet and sand, silt and clay soil matrix with a distance of 0 feet above groundwater.
- Soil screening levels based on a groundwater depth of 40 feet for C23 - C32.
- Soil screening levels based on a groundwater depth of 40 feet and sand soil matrix with a distance of 20 feet above groundwater.
- Soil screening levels based on a groundwater depth of 40 feet and sand soil matrix with a distance of 20 feet above groundwater.
- Soil screening levels based on a groundwater depth of 40 feet with a distance of 20 feet above groundwater.
- Cleanup level determination for notes i to n, p to r, t, and v were based on the Regional Board's "Designated Level Methodology", dated October 1986 and updated June 1989. The cleanup level is based on the natural attenuation factor of 100 used for silt, sand and clay with shallow groundwater depth (40 bgs) and a leachability factor of 10 multiplied by the maximum contaminant level of Antimony in groundwater of 0.006 mg/L.

- j. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Arsenic in groundwater of 0.05 mg/L.
- k. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Barium in groundwater of 1 mg/L.
- l. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Beryllium in groundwater of 0.004 mg/L.
- m. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Cadmium in groundwater of 0.005 mg/L.
- n. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Chromium in groundwater of 0.05 mg/L.
- o. The cleanup level is based on the US EPA PRG Residential limit of 4,700 mg/Kg
- p. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Copper in groundwater of 1.3 mg/L.
- q. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Lead in groundwater of 0.015 mg/L.
- r. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Mercury in groundwater of 0.002 mg/L.
- s. The cleanup level is based on the US EPA PRG Residential limit of 390 mg/Kg.
- t. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Nickel in groundwater of 0.1 mg/L.
- u. The cleanup level is based on the US EPA PRG Residential limit of 550 mg/Kg.
- v. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the secondary maximum contaminant level of Zinc in groundwater of 5 mg/L.

IV. MAXIMUM DOCUMENTED CONTAMINANT CONCENTRATIONS IN GROUNDWATER

Contaminant	Groundwater (µg/L)		Maximum Contaminant Level (µg/L)	Contaminant	Groundwater (µg/L)		Maximum Contaminant Level (µg/L)
	Earliest (98 to 01)	Latest (2001)			Earliest (98 to 01)	Latest (2001)	
Benzene	77	<125	1	TCF	35,000	31,000	5
Toluene	140	<125	150	MEK	8.4	<500	1,900 ^a
Xylenes	1.6	<100	1,750	Acetone	490	<250	610 ^a
1,1-DCA	240	<125	5	Arsenic	320	320	50
1,1-DCF	220	<125	6	Barium	320	320	1000
1,2-DCA	65	<125	0.5	Chromium	<10	<10	50
c-1,2-DCE	450	350	6	Chromium VI	<10	<10	50
t-1,2-DCE	45	<125	10	Molybdenum	1,100	950	180 ^a
PCE	190	150	5	Zinc	25	24	5000 ^b

a – US EPA Region IX PRGs for Tap Water

b – Secondary MCL

V. SOIL REMEDIATION

Method: Excavation, Soil Vapor Extraction and Reaming Out of Residual Contamination	Duration of remediation: Five Years
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VI. GROUNDWATER REMEDIATION

Method: None	Duration of remediation: N/A
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VII. FREE PRODUCT:

Was free product encountered? No	Has free product been totally recovered? N/A
When was free product recovery project completed? N/A	

VIII. RECOMMENDED ACTION:

Soil Closure only: Yes	Case Closure: No	Solvent Case? Yes
Additional Action Required (i.e.: additional site assessment, remediation, monitoring): Groundwater Monitoring, Investigation and Remediation		

IX. COMMENTS AND JUSTIFICATION FOR RECOMMENDED ACTION:

Jervis B. Webb properties are located at 5030 Firestone Boulevard and 9301 Rayo Avenue in the City of South Gate, California. The Webb-Firestone property (the site) occupies about 1.4 acres. This site is bounded on the north by Firestone Boulevard and on the south by Reliable Steel, Incorporated. Piazza Trucking (formerly Laidlaw) lie immediately east of the Webb site (See Figure 1). To the west is a 50-foot wide Union Pacific Railroad easement. The Webb-Firestone property includes a 20,000 square foot steel-framed building with corrugated steel siding.

The building is surrounded by asphalt and concrete paving except for a planter on the north side of the building. A five-foot wide rail spur enters the subject property from the northwest and extends across the west side to a 10,000 square foot, steel-framed open bay on the Reliable Steel property to the south. Along the entire western portion of the property is a 35-foot wide Los Angeles County Flood Control easement that contains a large underground storm drain. Another storm drain runs along the north side of the property along Firestone Boulevard. A sanitary sewer pipeline extends across the eastern side of the Webb-Firestone property to another sewer line in Rayo Avenue (south of the Reliable Steel property).

Webb of California manufactured conveyor belt systems at the Rayo property (now the Reliable Steel property) from the middle 1950s to early 1996. The Firestone property was purchased by Webb of California in 1975 from Spear Industries. Blake Rivet Company (Blake), an aircraft rivet manufacturer, which had been leasing the property prior to Webb's purchase, continued to lease the property until approximately 1981. Blake used an above ground anodizer as part of its rivet manufacturing operation. Wastewater from the anodizer was collected in floor trenches where it was directed to a three-staged clarifier made of concrete. The clarifier was located just to the south of the southern wall of the Firestone property building (see Figure 1) until it was removed in November 1996. The clarifier reportedly discharged into the local sewer system. After Blake's departure, Webb of California used the Firestone property primarily for storage of metal stock that was used at the adjacent Webb Rayo conveyor facility until it was purchased by Reliable Steel in 1997.

On October 18, 1996, Jervis Webb completed underground storage tank activities as well as general site cleanup work. The Los Angeles County Department of Public Works issued a certification for tank closure on December 17, 1996. The tanks were described as underground sumps. The concrete bottom of Tank 1 was broken and soil beneath the sump was sampled. Soil analysis did not detect any petroleum hydrocarbons, VOCs or elevated metals. Tank 2 consisted of a three foot diameter open-bottomed steel pipe extending four feet below the floor level, with a man-hole type cover set in the concrete floor of the building. A layer of paint, approximately one to two inches thick was observed on the gravelly fill soil at the base of the structure. Soil sample P-1-2 from the soil at the base of the structure was taken approximately two feet below the paint layer and analyzed for VOCs, petroleum hydrocarbons and metals. The results of the soil sample contained elevated metal for arsenic, cadmium, chromium and lead. Further excavation to a depth of approximately 10 feet below floor level was conducted to further delineate the extent of the contamination. Additional four soil samples from the excavation did not detect elevated metals, total petroleum hydrocarbons or VOCs to a maximum depth of 10 feet bgs. Approximately 35 cubic yards of soil was excavated for the delineation of contamination of Tank 2. The gravelly fill material was observed to continue to the full depth of the excavation, fifteen feet below floor level. The excavations were backfilled with import fill and the excavated soil removed and disposed off-site. On November 18, 1996, Jervis Webb removed oil-stained soil from a section of the unlined utility trench near the vicinity of Tank 2 by the building footing. One cubic yard of soil, approximately one-foot thick extending approximately 15 feet, was removed. Elevated petroleum hydrocarbons were detected in addition to VOCs 1,1-DCA, 1,1,1-TCA, benzene and toluene. Confirmation samples contained no VOCs and petroleum hydrocarbons of middle to heavy distillates in one confirmation sample of 1,800 mg/Kg in the C10-C20 and 16,000 mg/Kg in the C20-C30 hydrocarbon range. After tank closure activities at the site, Jervis Webb sold the southern portion of the site to Reliable Steel and retained the northern portion of the property for further environmental evaluation.

On October 28, 1997, Jervis Webb completed fourteen soil borings at northern portion of the site. Soil borings were sampled to a maximum depth of ten feet below ground surface (bgs) inside and outside the building and to a maximum depth of 20 feet bgs in the vicinity of the clarifier. Soil samples were analyzed for pH, petroleum hydrocarbons, metals and VOCs. Hexavalent chromium was detected in a boring at approximately 10.5 feet bgs with a concentration of 0.88 mg/Kg. No petroleum hydrocarbons were detected. Maximum concentration of VOCs included trichloroethylene of 270 mg/Kg and 140 mg/Kg perchloroethylene beneath the clarifier. On December 1, 1997, a soil gas survey was conducted at the site to identify potential areas of VOC contamination. The data indicated that the primary contaminants were TCE and PCE with maximum concentration of 25 µg/L of TCE and 28 µg/L of PCE. On December 2, 1997, five deep soil borings were completed at the site to determine the vertical extent of VOCs in soil beneath the clarifier and anodizing areas. Soil borings were completed to a maximum depth ranging between 46.5 feet to 62.5 feet bgs. Groundwater was encountered at approximately 57 feet bgs. Elevated concentration of TCE and PCE were detected in the soil samples.

On February 24 and 25, 1998, three groundwater wells were installed at the site and screened from 40 feet to 70 feet bgs. The greatest depth of investigation was 73 feet bgs. The depth to groundwater ranged for approximately 43.5 to 44.8 feet bgs. Maximum concentration of TCE from groundwater monitoring was 25,000 µg/L. PCE, cis and trans 1,2-DCE, 1,1-DCE, 1,1-DCA and toluene were detected. A CPT investigation of the groundwater was conducted on October 1, 1999 at nine locations to further characterize the extent of groundwater impact. Two new groundwater monitoring wells were installed. A maximum concentration of 35,000 µg/L of TCE was detected in groundwater. Other VOCs detected were PCE, cis and trans 1,2-DCE, 1,1-DCA, 1,2-DCA and 1,1-DCE, acetone, benzene, xylenes, toluene and MEK.

On June 1, 1999, the clarifier at the site was excavated, removed and backfilled with 47 cubic yard of clean fill material. Eight vapor wells were installed at the site on June 23, 1999. The monitoring wells and probes were designed and constructed such that they could be converted for use as vapor extraction wells. Four soil vapor extraction (SVE) wells and four vapor monitoring probes were installed. Three of the monitoring probes were later converted to SVE wells by connecting to the SVE vacuum manifold. A total of four shallow SVE wells are screened from 19 to 25 feet, while three deep SVE wells are screened from 30 to 40 feet. The SVE system started operation on March 16, 2000. The system has operated nearly continuously for the past 15 months, except for down periods. Approximately 155 pounds of VOCs had been removed from the soil as of May 2001.

On September 13, 2001, five soil confirmation soil borings were drilled. The soil samples were analyzed for VOCs and metals. Two confirmation borings CB-3 and CB-4 contained elevated TCE concentrations of 290 and 630 µg/Kg, respectively. On December 14, 2001, residual soil contamination to include hexavalent chromium was drilled-out at the site. The borings were drilled using a six-inch diameter auger and subsequently reamed out by a twelve-inch auger. A total of three drill-outs were completed to remove approximately 3 cubic yards of soil. Confirmation soil samples were collected at the bottom of each borehole.

Residual contaminant concentration of petroleum hydrocarbons, metals and VOCs are slightly above acceptable levels. Boring CB-1 contains 35 µg/Kg of TCE at a depth of 20 feet bgs with a cleanup level of 34 µg/Kg, 67 µg/Kg of TCE at 25 feet bgs with a cleanup level of 45 µg/Kg.

Boring CB-3 contains 24 µg/Kg of TCE at a depth of 36 feet with a cleanup level of 6 µg/Kg. The residual contamination is localized, of limited mass and the planned use of the site as a paved development will minimize future groundwater impacts.

Petroleum hydrocarbons are slightly above acceptable limits. Sample B-1-2 contained 1,800 mg/Kg of C-10 to C-20 range hydrocarbon with a cleanup level of 1,000 mg/Kg and 16,000 mg/Kg of C20 to C-30 range hydrocarbon with a cleanup level of 10,000 mg/Kg. The elevated residual contaminants will attenuate due to the biodegradable nature of petroleum hydrocarbons.

The elevated Antimony concentration of 360 mg/Kg was taken from sample DS-2. DS-2 was primarily dry paint scrapings for waste characterization. The rest of the samples were non-detect for Antimony. Arsenic concentrations at the site vary from non-detect to 7.6 mg/Kg. The elevated arsenic concentration of 26 mg/Kg was taken from sample P-1-2 approximately two feet below the paint layer at the base of the structure Tank 2. The area around and below P-1-2 was excavated. No other elevated concentrations of arsenic were detected at the site. The distribution of arsenic concentration reflects background concentrations. The elevated Barium concentration of 2,700 mg/Kg was taken from sample DS-2. The next highest concentration of Barium was 170 mg/Kg in boring CB-1 at 25 feet bgs. Cadmium concentration in sample P-1-2 was 8.3 mg/Kg. The next highest concentration of cadmium detected was detected in DS-2 of 2.3 mg/Kg and 0.6 mg/Kg in boring CB-1 at 25 feet bgs. The elevated Chromium concentration of 7,300 mg/Kg was taken from sample DS-2. The next highest chromium concentration was detected in P-1-2 of 350 mg/Kg, SP-1-E and SP-1-W of 97 mg/Kg, SP-2-N and SP-2-S of 85 mg/Kg and boring B6 at six feet bgs of 74 mg/Kg. The elevated concentrations of chromium in the stockpile samples SP-1-E, SP-1-W, SP-2-N and SP-2-S are not representative of the rest of concentrations detected at the site, with the exception of 74 mg/Kg at B6 at five feet. All the other detected chromium concentrations are below the cleanup level of 50 mg/Kg. The elevated lead concentration of 31,000 mg/Kg was taken from sample DS-2. The next highest sample was obtained from P-1-2 of 1,600 mg/Kg, SP-2-N and SP-2-S of 25 mg/Kg and SP-1 of 17 mg/Kg. The elevated concentrations of lead in the stockpile samples SP-2-N and SP-2-S, and SP-1 are not representative of the rest of concentrations detected at the site. All other lead levels are below the cleanup level of 15 mg/Kg for lead. The elevated mercury concentration was encountered in boring CB-1 at 30 feet bgs with a cleanup level of 2 mg/Kg. All the other detected Mercury concentrations are below the cleanup level of 2 mg/Kg. Boring CB-1A contains 0.24 mg/Kg of hexavalent chromium with a cleanup level of 0.2 mg/Kg. The residual contamination mentioned above is localized, of limited mass and the planned use of the site as a paved development will minimize future groundwater impacts.

All other soil analysis at the site were non-detect or below acceptable levels based on the U.S. EPA PRG levels for human health protection and Regional Board's Interim Site Assessment & Cleanup Guidebook (site specific cleanup goals for groundwater protection). Based upon the information submitted, the site does not have a soil source for the VOCs detected in the groundwater at this time. The metal cleanup level determination was based on the Regional Board's "Designated Level Methodology", date October 1986 and updated June 1989. The cleanup level is based on the natural attenuation factor of 10 used for silt, sand, and clay with shallow groundwater depth and a leachability factor of 100 multiplied by the maximum contaminant level (or secondary maximum contaminant level) of each metal. Based on the submitted data, staff submits Jervis Webb's recommendation of no further action for soil at the subject site, with groundwater monitoring, investigation and remediation is appropriate at this time.



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Gray Davis
Governor

December 12, 2001

Mr. Gene Lucero
Latham & Watkins
633 West Fifth Street, Suite 4000
Los Angeles, CA 90071-2007

**JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD, SOUTH GATE
(SLIC NO. 744)**

Dear Mr. Lucero:

Thank you for your October 29, 2001 letter to the Los Angeles Regional Water Quality Control Board (Regional Board) regarding the Jervis Webb site. Your letter sought soil closure for the sale of the Jervis Webb property. A follow-up letter, dated November 29, 2001, requested additional assistance on the soil closure.

Regional Board staff have reviewed the Soil Closure Report submitted on October 4, 2001. In order to evaluate your site for soil closure, please address the elevated values of hexavalent chromium and trichloroethylene (TCE) at the site. Boring B4 contains 0.88 milligrams per kilogram (mg/kg) of hexavalent chromium at a depth of 10.5 feet below ground surface (bgs). Confirmation boring CB-3 contains 290 micrograms per kilogram ($\mu\text{g/kg}$) and 24 $\mu\text{g/kg}$ of trichloroethylene (TCE) at a depth of 25 feet bgs and 30 feet bgs, respectively. Confirmation boring CB-4 contains 93 $\mu\text{g/kg}$ at a depth of 25 feet bgs and 660 $\mu\text{g/kg}$ of TCE at 30 feet bgs. The residual contamination at the site is not protective of groundwater quality or human health as determined in accordance with the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook, and the preliminary remedial goals (PRGs) soil screening levels prepared by the United States Environmental Protection Agency, Region IX. The removal or further remediation of the residual contamination at the site will be required before soil closure is considered.

We look forward to working with you towards regulatory site soil closure. Please call me at (213) 576-6605, or the Project Manager Steven Hariri at (213) 576-6745, if you have any questions.

Sincerely,

Dennis Dickerson
Executive Officer

cc: Mr. Michael Farley, Jervis B. Webb Company
Gary Cronk, IT Corporation

California Environmental Protection Agency

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Gray Davis
Governor

January 23, 2002

Mr. Michael Farley
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

NO FURTHER ACTION FOR SOIL ASSESSMENT AND CLEANUP FOR INDUSTRIAL WASTE CLARIFIER, SUMPS T1 AND T2 AND ANODIZING AREA AT JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD AND 9301 RAYO AVENUE, SOUTH GATE (SLIC NO. 744)

Dear Mr. Farley:

Thank you for the Closure Report, dated October 4, 2001, and subsequent Soil Removal Activities Report dated December 17, 2001, for the site, prepared by IT Corporation. Multiple Phases of soil and groundwater investigation and remedial activities were conducted at the site to characterize and cleanup the sources of total recoverable petroleum hydrocarbons (TRPH), volatile organic compounds (VOCs) and metals contamination. The sources of contamination included the industrial waste clarifier, sumps T1 and T2, and anodizing areas. Soil analytical testing results indicated non-detect to 270,000 µg/Kg of trichloroethylene (TCE), non-detect to 140,000 µg/Kg of perchloroethylene (PCE), non-detect to 52 µg/Kg of 1,1-dichloroethane (1,1-DCA), non-detect to 300 µg/Kg of 1,1,1-trichloroethane (1,1,1-TCA), non-detect to 280 mg/Kg of TRPH, non-detect to 5 µg/Kg of benzene, non-detect to 12 µg/Kg of toluene, non-detect to 140 µg/Kg of TRPH C5-C10, non-detect to 6,900 mg/Kg of TRPH C10-C20, non-detect to 29,000 mg/Kg of TRPH C20-C30, non-detect to 360 mg/Kg of antimony, non-detect to 26 mg/Kg of arsenic, 2,700 mg/Kg of barium, non-detect to 8.3 mg/Kg of cadmium, 7,300 mg/Kg of chromium, non-detect to 0.88 mg/Kg of hexavalent chromium, non-detect to 31,000 mg/Kg of lead, and non-detect to 2.5 mg/Kg of mercury. Approximately 39 cubic yards of impacted soil were excavated from the site. A soil vapor extraction system was operated at the site. Confirmation soil analytical testing results and residual contaminant concentrations indicate a maximum of 67 µg/Kg of TCE, 39 µg/Kg of PCE, 1,800 mg/Kg of TRPH C20-C30, 16,000 mg/Kg of TRPH C20-C30, 7.9 mg/Kg of arsenic, 170 mg/Kg of Barium, 0.6 mg/Kg of cadmium, 74 mg/Kg of chromium, 0.24 mg/Kg of hexavalent chromium, 25 mg/Kg of lead, and 2.5 mg/Kg of mercury.

Groundwater is encountered at approximately 42 feet below ground surface. The groundwater beneath the site is impacted with VOCs and metals. The groundwater contamination consists of 77 µg/L of Benzene, 140 µg/L of Toluene, 240 µg/L of 1,1-DCA, 220 µg/L of 1,1-DCE, 65 µg/L of 1,2-DCA, 450 µg/L of cis 1,2-DCE, 45 µg/L of trans 1,2-DCE, 190 µg/L of PCE, 35,000 µg/L of TCE, 8.4 µg/L of MEK, 490 µg/L of Acetone, 320 µg/L of arsenic and 1,100 µg/L of molybdenum.

Based upon the information submitted, the Regional Board has no further requirements with respect to soils at the site. The residual levels of TRPH, metals, and VOCs, with the exception of minor isolated elevated concentrations, detected in the vadose zone at the site are below the site specific cleanup levels established by the Regional Board's 1996 Interim Site Assessment and Cleanup Guidebook, "Designated

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Mr. Michael Farley
Jervis B. Webb Company

- 2 -

January 23, 2002

Level Methodology", date October 1986 and updated June 1989 for groundwater resource protection, and the U.S. EPA Region IX preliminary remediation goals (PRG) levels for human health protection. The residual elevated concentrations of TRPH, metals and VOCs are localized, of limited mass and the planned use of the site as a paved development will minimize future groundwater impacts.

This determination of no further action for soil only, is based on available information and the provision that the information provided to this agency was accurate and representative of site conditions. Please contact the Regional Board immediately, if additional soil contamination is discovered during any future development activities.

However, based on the existing groundwater contamination on-site, we are requiring groundwater monitoring for all wells (MW-1 to MW-5). In addition, the Regional Board may require additional groundwater assessment pending our review of any off-site soil and groundwater assessment data and/or potential sources. We are also providing you the opportunity to present any additional data that may suggest that there is other contributing groundwater contaminant sources off-site.

Please contact Dr. Rebecca Chou at (213) 576-6733 or Mr. Steven Hariri at (213) 576-6745, if you have any questions regarding this matter.

Sincerely,



Dennis A. Dickerson
Executive Officer

cc: Robert Sams, Legal Council, State Water Resources Control Board
Gene Lucero, Latham & Watkins
Gary Cronk, IT Corporation
Mr. Jeff Palmer and Ms. Nikki Reagan, Reliable Steel

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Gray Davis
Governor

March 14, 2002

Mr. Michael Farley
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

REQUEST TO MODIFY GROUNDWATER SAMPLING METHODOLOGY AND SEMI-ANNUAL GROUNDWATER MONITORING REPORT- JERVIS B. WEBB COMPANY - 5030 FIRESTONE BOULEVARD, SOUTH GATE (SLIC NO. 744)

Dear Mr. Farley:

The Los Angeles Regional Water Quality Control Board (Regional Board) staff has received and reviewed the "Request to Modify Groundwater Sampling Methodology and Semi-annual Groundwater Monitoring Report", dated February 28, 2002. Based on our review of the information submitted, we have the following comments:

1. You are authorized to perform semi-annual groundwater monitoring for volatile organic compounds (VOCs) and metals by passive diffusive bag (PDB) sampling. Please suspend the PDBs near the bottom of each groundwater monitoring well.
2. Please correct the Maximum Contaminant Levels (MCL) of chromium to 50 micrograms per liter (ug/l) and barium to 1,000 ug/l in Table 3 of the groundwater monitoring report.
3. Laboratory reports and method detection limits (MDLs) shall meet the requirements specified in the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook, Appendices B and C.
4. Please notify the Regional Board at least 10 working days prior to the start of fieldwork.

Please call me at (213) 576-6745, if you have any questions.

Sincerely,

S. Steven Hariri, PE
Water Resources Control Engineer - D
Site Cleanup III Unit

cc: Gary Cronk, IT Corporation

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Gray Davis
Governor

June 28, 2002

Mr. Michael Farley
Jervis B. Webb Company
34375 W. Twelve Mile Rd.
Farmington Hills, MI 48331-5624

ANNUAL ESTIMATION LETTER FOR SPILLS, LEAKS, INVESTIGATIONS, AND CLEANUP (SLIC) COST RECOVERY PROGRAM – JERVIS WEBB CO. - 5030 FIRESTONE BOULEVARD, SOUTH GATE (SLIC NO. 0744, PCA# 2042J00)

Dear Mr. Farley:

Section 13304 of the California Water Code (Porter Cologne) allows the Regional Board to recover reasonable expenses from a responsible party for overseeing the investigation and cleanup of unregulated discharges adversely affecting the State's waters. It is our intent to continue to recover costs for regulatory oversight work conducted at this site in accordance with our letter dated February 2, 1998. In compliance with Section 13365 of the California Water Code, this letter is being sent to provide you with the following information regarding costs for regulatory oversight work:

1. A detailed estimate of the work to be performed or services to be provided.
2. A statement of the expected outcome of that work.
3. The billing rates for all individuals and classes of employees expected to engage in the work.
4. An estimate of all expected charges to be billed to you by this agency.

Estimate of Work to be Performed

Board staff estimate that the following work will be performed during the fiscal year 2002/2003 (July 1, 2002 to June 30, 2003):

- Review groundwater monitoring reports, other project technical reports that may be necessary, and other information as appropriate.
- Written correspondences and telephone communications with Jervis B. Webb Company, its representatives and interested third parties.
- Conduct internal communications (i.e. meetings, memos, site status updates, program updates, etc.) regarding the project.
- Meet with Jervis B. Webb Company and its representatives.
- Site inspections and/or collect confirmation samples as appropriate.

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Mr. Farley
Jervis Webb Co.

- 2 -

June 28, 2002

Expected Outcome of Work

The following is the expected outcome of work that will be performed during fiscal year 2002/2003:

- Track groundwater results.
- Written comments on technical reports to be submitted as appropriate.
- Verify adequacy of technical reports.
- Conduct meetings and/or additional site inspections to facilitate the completion of the project.

Billing Rates

Enclosed is the billing rate for employees expected to perform the work. The names and classifications of employees that charge time to this site will be listed on the invoices. The average billing rate is approximately \$80.00 per hour.

Estimation of Expected Charges

Board staff expects to charge about 100 hours of work related to this site during fiscal year 2002/2003. Based on the average billing rate of \$80.00 per hour, the estimated billing charge for this site during fiscal year 2002/2003 is about \$8,000.

If you have any questions, please contact Steven Hariri (213) 576-6745 or J. T. Liu at (213) 576-6667.

Sincerely,



Dennis A. Dickerson
Executive Officer
Los Angeles Regional Water Quality Control Board

Enclosure: Billing Rate Description

cc: Donna Vercruyssen, SWRCB - CWP

LATHAM & WATKINS

ATTORNEYS AT LAW

533 WEST FIFTH STREET, SUITE 4000

LOS ANGELES, CALIFORNIA 90071-2007

TELEPHONE (213) 485-1234

FAX (213) 891-8763

FACSIMILE TRANSMISSION**DATE:** November 29, 2001**To:**

Name	Fax No.	Phone No.
Steve Hariri	(213) 576-6717	

FROM: Gene A. Lucero**RE:** Jervis B. Webb of California Site , South Gate

<input type="checkbox"/> ORIGINAL(S) WILL FOLLOW	NUMBER OF PAGES, INCLUDING COVER: 2
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MESSAGE:

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November 29, 2001

Arthur Heath
Rebecca Chou
Steve Hariri
California Regional Water Quality Control Board
320 W. Fourth Street, Suite 200
Los Angeles, CA 90013

Re: Jervis B. Webb Company of California ("Webb")
City of South Gate
RWQCB LIC File No. 744 (the "Site")

Dear Art, Rebecca, and Steve:

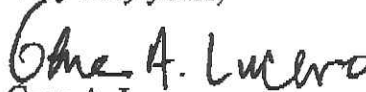
On October 4, 2001, Webb submitted a Soil Closure Report as the culmination of extensive investigation and remedial efforts conducted at the Site over many years under the direction of the Regional Board as part of the fee-for-service program. Following submission of the Soil Closure Report, Webb structured a sale of the property to close by December 28, 2001, provided that the Board issued a soil closure letter.

In the October 29, 2001 follow-up letter from me to Dennis Dickerson, we explained the pending sale and requested that soil closure for the Site be issued by November 21, 2001 in order to meet the lender's procedures for approving financing and closing escrow on the sale of the property before year's end. Unfortunately, since the soil closure letter has not yet been issued, the sale of the property cannot occur as originally negotiated.

Webb has worked long and hard, with your assistance, to remediate the soil and position itself to sell this long-vacant property, located in a community redevelopment area, so that it can again become a job-producing, income-producing parcel of real estate that benefits the City of Southgate and the State of California. We have restructured the transaction to close on January 15, 2002, subject to receiving the soil closure letter and lender approval. In light of the restructured close of escrow, we ask that the soil closure letter be issued by December 19, 2001. This date is critical since the buyer's environmental review period expires on December 28, 2001 and without the closure letter it is likely that the present Purchase Agreement will be cancelled by the buyer.

If there is any assistance that our consultants, attorneys, or I can provide, we stand ready. Thank you for your continued attention and diligence on this matter.

Very truly yours,



Gene A. Lucero
of LATHAM & WATKINS

cc: Michael J. Farley



California Regional Water Quality Control Board

Los Angeles Region

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Secretary for
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Gray Davis
Governor

November 8, 2001

Mr. Michael Farley
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

QUARTERLY PROGRESS REPORT AND REQUEST FOR REDUCTION IN THE FREQUENCY OF GROUNDWATER MONITORING – JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD, SOUTH GATE (SLIC NO. 744)

Dear Mr. Farley:

The Los Angeles Regional Water Quality Control Board (Regional Board) staff has received and reviewed the "Quarterly Progress Report", dated July 31, 2001. Based on our review of the information submitted, we have the following comments:

1. Please notify the Regional Board at least 10 working days prior to the start of fieldwork.
2. Laboratory reports and method detection limits (MDLs) shall meet the requirements specified in the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook, Appendices B and C.
3. You are required to perform semiannual groundwater monitoring for volatile organic compounds (VOCs) and metals. The semiannual groundwater monitoring report must be submitted by the thirtieth day following the end of the semiannual period, as shown in the following schedule, with the first semiannual groundwater monitoring report due on **January 30, 2002**:

<u>Report Period</u>	<u>Report Due Date</u>
January – June	July 30 th
July – December	January 30 th

Please call me at (213) 576-6745, if you have any questions.

Sincerely,

S. Steven Hariri, PE
Water Resources Control Engineer - D
Site Cleanup I Unit

cc: Gary Cronk, IT Corporation
Steve Chambers, EKI, Inc.

California Environmental Protection Agency

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1-14-02

Jervis Webb Meeting

<u>Name</u>	<u>Organ. / Rep</u>	<u>Phone #</u>
Arthur Heath	CRWQCB-LA	(213) 576-6725
Michael Scott Feeley	Latham & Watkins	213-891-7895
Milce Farley	Jervis B. Webb Co.	248-553-1201
Gene Lucero	Latham & Watkins	213-891-8332
David Bachorowski	RWQCB-LAR	(213) 576-6620
Dennis Ducco	"	213 576 6605

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October 29, 2001

VIA FAX & U.S. MAIL

Dennis Dickerson
Executive Officer
California Regional Water Quality Control Board
320 W. Fourth Street, Suite 200
Los Angeles, CA 90013

Re: Jervis B. Webb Company of California ("Webb")
City of South Gate
RWQCB LIC File No. 744 (the "Site")

2001 OCT 30 P 2:38

Dear Dennis:

We are requesting your assistance in obtaining soil closure for the above referenced Site in light of the pressing time constraints of a pending sale.

On October 4, 2001, Webb submitted the Soil Closure Report which presented the results of the five recent confirmation borings in the context of the extensive investigation and remedial efforts conducted at the Site over many years under the direction of the Regional Board. The Firestone property is Webb's only remaining real estate and Webb has already expended more than \$900,000 in environmental costs at the Site, an amount which exceeds the sale price of the Firestone property. Webb has entered into a transaction to sell the Firestone property; however, the sale is contingent on receiving a soil closure letter from the Regional Board promptly and closing escrow by December 28, 2001. In order to meet the lender's procedures for approving financing, Webb must receive the closure letter as soon as possible but no later than Wednesday November 21, 2001.

The Firestone property is located in a community redevelopment area and the City of South Gate is particularly concerned with transforming this long vacant, non-income, non-job generating parcel into a productive economic use. We have requested soil closure of the Site at this time based on the extensive investigation of the Site, the removal of contaminant source areas, the SVE system's effective remediation of VOCs, the very low level of remaining residual VOCs, the background levels of naturally occurring arsenic, and the lithology and zoning of the Site.

We appreciate the heavy work load of you and your staff. Due to the time-sensitive nature of the transaction and the comprehensive investigation and remediation conducted over many years at the Site, we ask your help in obtaining prompt review and soil closure.

Dennis Dickerson
October 29, 2001
Page 2

In addition, Webb has conducted quarterly groundwater monitoring of the Site since March 1998. The thirteen consecutive monitoring events have yielded consistent results. By letter dated July 31, 2001, Webb presented data demonstrating that a reduction in the frequency of monitoring is warranted. We have not yet received a response from the Regional Board to our plan to monitor annually rather than quarterly. Such a reduction is both appropriate and will facilitate the transaction. We would appreciate your written concurrence.

Thank you for your attention and consideration; we are available at your convenience to provide any additional information or answer any questions.

Yours very truly,



Gene A. Lucero
of LATHAM & WATKINS

cc: Arthur Heath
Rebecca Chou
Steve Hariri



October 8, 2001

California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013
ATTN: Steven Hariri

RE: Explanation of SPLP Extraction Method
Soil Closure Report
Jervis B. Webb of California
South Gate, CA

Dear Mr. Hariri:

Per your request, I am writing to provide a further explanation of the SPLP extraction method used for the Jervis B. Webb Soil Closure Report submitted on October 4, 2001. I spoke with Larry Lem, Laboratory Director at Calscience Environmental Laboratories, who performed the SPLP extraction and testing for us. Mr. Lem stated that the SPLP method (EPA Method 1312) uses a 20:1 dilution (20 times the volume of water to soil) in the leaching process. Note: a 10-fold dilution is used in other leaching methods such the TCLP and the STLC. The concentration that is reported by the lab is the exact concentration of the leachate (no modification made for dilution). Therefore the concentration of the leachate can be directly compared to the MCL. In our case, the 10 ug/l from sample CB-4 @ 30 feet can be compared to the MCL for TCE of 5 ug/l. Note that because of the 20-fold dilution, the maximum concentration of the leachate (if all VOCs in the sample were leachable) would be 31 ug/l (630 divided by 20). Since our concentration was 10 ug/l, about 1/3 of the VOCs in the sample are leachable (and 2/3 are not leachable).

The SPLP method utilizes de-ionized water that is modified to a pH of 5.5 using sulfuric acid. This method is the least aggressive of the leaching methods. The other methods use a different acid and lower pH.

I trust this information will be of use to you. Please call me at (949) 660-7511 if I can be of further assistance.

Sincerely,
IT Corporation

A handwritten signature in dark ink, appearing to read 'Gary Cronk', written over a horizontal line.

Gary Cronk, P.E.
Project Manager

Cc: Mike Farley, Jervis B. Webb
Michael Feeley, Latham & Watkins

Corporation

3000 Michelson Drive, Suite 200
Irvine, CA 92612-1692
Tel. 949.261.6441
Fax. 949.474.8309

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2001 OCT 11 P 1:29



California Regional Water Quality Control Board
Los Angeles Region

320 W. 4th Street, Suite 200, Los Angeles, CA 90013
Phone (213) 576-6600 FAX (213) 576-6640



RECORD OF COMMUNICATION		<input type="checkbox"/> PHONE CALL <input type="checkbox"/> CONFERENCE	<input type="checkbox"/> DISCUSSION <input type="checkbox"/> OTHER (specify) _____	<input checked="" type="checkbox"/> FIELD TRIP
TO:	FROM: STEVEN HAZIRI	DATE: 9/13/01		
tel	tel			
SUBJECT: FIELD INSPECTION OF CONFIRMATION BORINGS		FILE NO: 744		
Summary of Conversation:				
11AM ONSITE, PRESENT AT SITE CPT RIG, MOBILE LAB WITH GCMS AND GEOPROBE RIG. CURRENTLY WORKING ON B-16 CONFIRMATION BORING. CB-2 ALREADY COMPLETED. WILL COMPLETE CB-1, CB-3 AND B-15 WITH GEOPROBE. THE CPT RIG WILL NOT FIT INSIDE BUILDING. WILL WORK ON ACCESS TO RELIABLE STEEL FOR T-1 AND T-2 SAMPLING.				
Conclusions, Action taken or required:				
Information copies to:				

JERVIS B. WEBB COMPANY
Law Department

34375 WEST TWELVE MILE ROAD
FARMINGTON HILLS, MICHIGAN 48331-5624

MICHAEL J. FARLEY
ASSOCIATE GENERAL COUNSEL

TELEPHONE: 1-248-553-1201
FACSIMILE: 1-248-553-1292
E-MAIL: MFarley@JERVISWEBB.COM

August 24, 2001

Via Fax and U.S. Mail

Mr. Steven Hariri
California Regional Water Quality Control Board
320 4th Street, Suite 200
Los Angeles, CA 90013

Re: Jervis B. Webb Company of California: Soil Closure Workplan and Addendum
5030 Firestone Blvd./ 9301 Rayo Avenue, South Gate, California
RWQCB SLIC File No. 744

Dear Mr. Hariri:

We have received and reviewed your letter dated August 14, 2001 approving implementation of the Workplan subject to certain enumerated conditions. Jervis B. Webb Company of California ("Webb") is prepared to accept each condition with the exception of condition 4. For the following reasons, we respectfully ask that you waive the request to install two borings next to the former locations of Tank 1 and Tank 2 on the Rayo property and sample for arsenic and hexavalent chromium.

We question the need to install two borings and sample for arsenic and hexavalent chromium in an area where seven discreet samples were previously taken and for which closure was granted. As you know, both Tank 1 and Tank 2 were removed and closed in 1996 under the direction of the Los Angeles County Department of Public Works ("LACDPW"). Sampling beneath the bottom of Tank 1 found arsenic levels (2.4 and 2.2 mg/kg) below the industrial PRG of 2.7 mg/kg, and total chromium levels (12 and 11 mg/kg) below the industrial PRG of 450 mg/kg. The total chromium results are also below the industrial PRG for hexavalent chromium of 64 mg/kg.

Tank 2 was actually a four foot deep sump. Following an over excavation to a depth of ten feet, sampling of the sidewalls and bottom of Tank 2 found arsenic levels of 1.6 mg/kg to 3.1 mg/kg, which is functionally the same as the industrial PRG of 2.7 mg/kg. Total chromium (ranging from 7.4 to 16 mg/kg) was below the industrial PRG for total chromium as well as below the industrial PRG for hexavalent chromium.

Not only are the levels of arsenic and chromium low, but these compounds do not readily migrate in soils. Moreover, there is a 3 to 5 foot thick continuous clay layer at 25 feet below ground

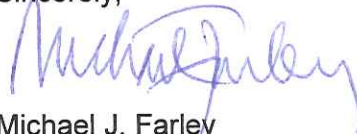
surface which forms a barrier to migration. Groundwater is found at 40 feet below ground surface.

The Rayo property is no longer owned by Webb. The former tank locations are beneath a concrete slab inside a large industrial hanger building in an area zoned heavy industrial. Heavy cut metal products and equipment are stored on and around the former tank location by the current owner. This makes access difficult. In addition, there is no guarantee that Webb could obtain an access agreement and conduct the testing in the near term.

In sum, prior sampling of Tank 1 and Tank 2 under the direction of the LACDPW found levels of arsenic at or below the industrial PRG and levels of chromium well below industrial PRGs; a 3 to 5 foot thick continuous clay layer underlies the area at a depth of 25 feet which provides a barrier to downward migration and there is a concrete slab covering the area which prevents contact with the soils; the property is not owned by Webb and the owner stacks heavy metal products at the former tank location. Based on these factors, we request withdrawal of condition 4 so that we can proceed promptly to implement the Workplan as modified by the Board.

If you feel you cannot withdraw condition 4, we would like to schedule a meeting to discuss this with the Board. Thank you for your assistance.

Sincerely,



Michael J. Farley
Associate General Counsel

MJF/sma
IM9685/1454



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August 14, 2001

Mr. Michael Farley
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

WORKPLAN FOR SOIL CLOSURE AND ADDENDUM TO WORKPLAN FOR SOIL CLOSURE – JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD, SOUTH GATE (SLIC NO. 744)

Dear Mr. Farley:

The Los Angeles Regional Water Quality Control Board (Regional Board) staff has received and reviewed the "Workplan for Soil Closure" (workplan) and "Addendum to Workplan for Soil Closure", dated June 25, 2001 and July 18, 2001, respectively. Based on our review of the information submitted, you are authorized to implement the workplan with the following conditions:

1. Please notify the Regional Board at least 10 working days prior to the start of fieldwork.
2. Contaminated soil and groundwater generated during drilling and water sampling shall be managed in accordance with appropriate regulations.
3. Laboratory reports and method detection limits (MDLs) shall meet the requirements specified in the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook, Appendices B and C.
4. Please install two additional confirmation borings each next to the former location of Tank 1 and Tank 2, respectively. The borings shall be discreetly sampled from five feet below surface to first encountered groundwater. Please analyze soil samples for arsenic and hexavalent chromium by EPA 6000 and 7000 series methods.
5. Please install an additional confirmation borings next to borings B-15 and B-16. The borings shall be discreetly sampled from five feet below surface to first encountered groundwater. Please analyze soil samples for volatile organic compounds by EPA Method 8260B.
6. Confirmation borings CB-1, CB-2 and CB-3 shall be discreetly sampled from five feet below surface to first encountered groundwater. In addition to the proposed EPA Method 8260B analysis for all borings, please analyze soil samples from CB-1 and CB-2 for Title 22 Metals to include hexavalent chromium by EPA 6000 and 7000 series methods from 20 feet and 15 feet below ground surface to first encountered groundwater, respectively.
7. Please submit site-specific soil cleanup screening levels in your soil confirmation investigation report, based on site-specific conditions, soil-screening levels shall be determined in accordance with the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook.

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8. Please submit a soil confirmation investigation report incorporating all information in previous reports. It must include a site location map, site layout map, historical boring locations, monitoring well locations, groundwater gradient, soil and groundwater isoconcentration contours for each contaminant, tables of contaminants, geologic cross-sections with soil contamination isoconcentrations, and a thorough historical description of all activities at the site to date.
9. The following cleanup criteria shall apply to the project:
 - a. Petroleum hydrocarbons and volatile organic compounds (VOCs) – Based on site-specific conditions, soil-screening levels shall be determined in accordance with the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook, or the preliminary remedial goals (PRGs) and soil screening levels prepared by the United States Environmental Protection Agency (U.S. EPA), Region IX, whichever is lowest.
 - b. Heavy metals and semi-VOCs – Based on site-specific conditions, the soluble designated level for constituents of concern shall be determined in accordance with the Designated Level Methodology for Waste Classification and Cleanup Level Determination dated 1986, updated 1989, by Jon Marshak, or the PRGs and soil screening levels prepared by U.S. EPA Region IX, whichever is lowest.
 - c. Risk assessments, including both human health risk assessments and ecological risk assessments, shall be conducted in areas where risk-based clean-up levels are established as cleanup criteria. Any such criterion requires approval by Office of Environmental Health Hazard Assessment (OEHHA) or Department of Toxic Substances Control (DTSC) and Regional Board Staff prior to implementation.
 - d. Please be advised that Total Threshold Limit Concentrations (TTLCs) and Soluble Threshold Limit Concentrations (STLCs) are waste classification criteria typically used for land disposal purposes. Waste classification levels are different from soil and groundwater cleanup levels, which are used for the protection of the groundwater resources and human health.

A report for the soil confirmation investigation must be provided to the Regional Board no later than **October 15, 2001**. Please call me at (213) 576-6745, if you have any questions.

Sincerely,



S. Steven Hariri, PE
Water Resources Control Engineer - D
Site Cleanup I Unit

cc: Gary Cronk, IT Corporation

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2001 AUG -6 P 4: 50

31 July 2001

CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

Mr. Steven Hariri
Site Cleanup Unit
California Regional Water Quality Control Board
Los Angeles Region
320 4th Street, Suite 200
Los Angeles, CA 90013

Subject: Quarterly Progress Report for April through June 2001 and
Request for Reduction in the Frequency of Groundwater Monitoring
for the Jervis B. Webb Company of California Property,
5030 Firestone Boulevard, South Gate, California
(RWQCB SLIC File No. 744; EKI 991103.01)

Dear Mr. Hariri:

On behalf of Jervis B. Webb Company of California ("Webb"), Erler & Kalinowski, Inc. ("EKI") is pleased to present the enclosed *Quarterly Progress Report for April through June 2001*, dated 24 July 2001. This report describes the groundwater monitoring and soil remediation activities completed during the period from April through June 2001 at the Webb property located at 5030 Firestone Boulevard in South Gate, California ("Site").

As shown in the enclosed report and other recent reports, quarterly groundwater monitoring at the Site during the past three years has yielded consistent results. Webb has conducted quarterly groundwater monitoring at the Site since March 1998; the enclosed progress report summarizes the results of the thirteenth consecutive quarter of groundwater monitoring at the Site. During these 13 groundwater monitoring events, the depth to groundwater generally has been measured once per month and samples of groundwater have been collected once per quarter from each of the monitoring wells at the Site. Each of the samples of groundwater collected at the Site have been analyzed for volatile organic compounds ("VOCs") using U.S. Environmental Protection Agency ("EPA") Method 8260B, or an equivalent method. In addition, the samples of groundwater collected during March and June 2001 were also analyzed for California Code of Regulations ("CCR") metals using EPA Methods 200.7, 206.2, 218.4, and 245.1.

The principle results of the groundwater monitoring performed at the Site are as follows:

- Monthly measurements of the depth to groundwater indicate that shallow groundwater beneath the Site consistently flows toward the south.

- The primary chemical of concern detected in samples of groundwater collected from monitoring wells at the Site is trichloroethene ("TCE"). The concentration of TCE detected in samples of groundwater collected from each of the monitoring wells at the Site has not varied significantly during three years of monitoring. As can be shown from the data provided in the enclosed report, the standard deviation of the TCE concentration detected in samples of groundwater collected from each well are less than 22 percent of the mean concentration for each well.
- No VOCs have been detected in samples of groundwater collected from downgradient monitoring well MW-4 during the last five quarterly monitoring events.

Given the consistent results obtained from three years of groundwater monitoring at the Site, Webb requests that the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB") reduce the required frequency of groundwater monitoring and reporting at the Site to one event per year. If this request is acceptable to the RWQCB, Webb proposes to initiate annual groundwater monitoring at the Site during January 2002. The groundwater monitoring will consist of annual measurement of the depth to groundwater and collection of groundwater samples from each well at the Site. The samples of groundwater collected at the Site will be analyzed for VOCs using EPA Method 8260B or an equivalent method. Webb will summarize the results of the groundwater monitoring in annual progress reports which will be submitted to the RWQCB within 60 days of the groundwater monitoring event. We look forward to receiving your approval for this modification.

Please contact us if you have any comments or questions regarding the enclosed report or Webb's request for reduction in the frequency of groundwater monitoring at the Site.

Very truly yours,

ERLER & KALINOWSKI, INC.



Steven R. Chambers, Ph.D.
Project Manager

cc: Mr. Michael Farley, Esq., Jervis B. Webb Company
Mr. Michael Feeley, Esq., Latham & Watkins

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July 31, 2001

CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

Arthur C. Heath, Ph.D.
Section Chief
California Regional Water Quality Control Board
320 W. Fourth Street, Suite 200
Los Angeles, CA 90013

Re: Jervis B. Webb Company of California ("Webb of California")
City of South Gate
RWQCB LIC File No. 744

Dear Art:

I am writing to thank you, Rebecca Chou and Steve Hairiri for meeting with us on July 11, 2001, and to summarize our understanding of the agreements reached at the meeting and the responsibilities that the Board and Webb of California agreed to pursue with respect to the Webb site.

- The Board agreed that at this time soil closure at the Webb of California site could proceed separate from any possible further work with respect to groundwater at the site. Webb submitted its soil closure work plan on June 25, 2001 and an Addendum to that work plan on July 18, 2001. We are currently waiting for the Board's response to the work plan. IT Corporation has indicated that it can begin field work within approximately one week of receiving approval to proceed with the soil closure work plan.
- The Board understands that Webb of California has already spent more on environmental issues at the site than the expected market price for the property and the importance, from Webb of California's standpoint, in moving ahead with a sale of the property.
- The Board agreed to send out, subject to availability of resources, questionnaires to upgradient property owners to gather further information on contamination that may be coming from such properties.

Arthur C. Heath, Ph.D.

July 31, 2001

Page 2

- Although the Board staff believes that Webb of California has presented credible evidence that contamination under its site may be coming from an offsite source, the Board staff would need additional information before it could recommend a No Further Action letter ("NFA") with respect to groundwater at the site. Webb of California agreed to present to the Board what, if any, further groundwater investigation Webb of California may propose to undertake.
- The Board staff does not expect Webb of California to do further groundwater investigation and/or remediation at the site; however, without further data, Board staff is not prepared to recommend an NFA for groundwater for Webb of California at this time.

Please let me know if you have any questions or if you disagree with this summary of the July 11 meeting. Once again, we appreciate your assistance and thank you for taking the time to meet with us.

Yours very truly,

A handwritten signature in cursive script that reads "Gene Lucero". The signature is written in dark ink and is positioned above the printed name.

Gene A. Lucero
of LATHAM & WATKINS



Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Los Angeles Region

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Gray Davis
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MEETING ATTENDANCE SHEET

DATE: 7/11/01

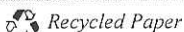
SUBJECT: JERVIS WEBB STATUS

NAME	ORGANIZATION	PHONE NUMBER
REBECCA CHU	RWQCB	213-576-6733
Steven Hariri	RWQCB	213-576-6745
MIKE SKLASH	DRAGON CORP.	248-932-0228
Gary Cronk	IT Corp.	949-660-7511
GENE LUCERO	Latham & Watkins	213-891-8332
Mike Farley	Webb	248-553-1201
Nicholas Farley	Webb	213-891-7895
ARTHUR HEATH	RWQCB	213-576-6725

MEETING NOTE

BLAKE LAW SITE 1981	BLAKE AT SITE UNTIL 1975, 1981 WEBB AT SITE. PAST FIVE YEARS VACANT. WOULD LIKE TO SALE PROPERTY. IN 1996 INVESTIGATION BEGAN. SOIL & GW INVESTIGATION. SPENT \$50,000 TO DATE. SOME CONTRIBUTION TO GW IS FROM OFFSITE SOURCE.
	REVIEW OF SOIL CLOSURE WORKPLAN AND SUBMIT COMMENT LETTER FOR WORK TO BEGAIN. REVIEW SITE PROPERTY ADJACENT TO WEBB SITE AND UPGRADEMENT FOR CHEMICAL USE QUESTIONABLE.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.



Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Los Angeles Region

(50 Years Serving Coastal Los Angeles and Ventura Counties)

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: <http://www.swrcb.ca.gov/rwqcb4>



Gray Davis
Governor

June 29, 2001

Mr. Michael Farley
Jervis B. Webb Company
34375 W. Twelve Mile Rd.
Farmington Hills, MI 48331-5624

**ANNUAL ESTIMATION LETTER FOR SPILLS, LEAKS, INVESTIGATIONS, AND
CLEANUPS COST RECOVERY PROGRAM
JERVIS WEBB CO.
5030 FIRESTONE BOULEVARD, SOUTH GATE
SLIC NO. 0744 (PCA NO. 2042J)**

Dear Mr. Farley:

Section 13304 of the California Water Code (Porter Cologne) allows the Regional Board to recover reasonable expenses from a responsible party for overseeing the investigation and cleanup of unregulated discharges adversely affecting the State's waters. It is our intent to continue to recover costs for regulatory oversight work conducted at this site in accordance with our letter dated February 2, 1998. In compliance with Section 13365 of the California Water Code, this letter is being sent to provide you with the following information regarding costs for regulatory oversight work:

1. A detailed estimate of the work to be performed or services to be provided.
2. A statement of the expected outcome of that work.
3. The billing rates for all individuals and classes of employees expected to engage in the work.
4. An estimate of all expected charges to be billed to you by this agency.

Estimate of Work to be Performed

Regional Board staff estimate that the following work will be performed during fiscal year 2001/2002 (July 1, 2001 to June 30, 2002):

- Review soil and groundwater investigation reports, groundwater monitoring reports, and other project technical reports that may be necessary.
- Provide written correspondences and telephone communications with Jervis B. Webb Company, its representatives and interested third parties.
- Conduct internal communications (i.e. meeting, memos, management reports, etc.) regarding the project.
- Meetings with Jervis B. Webb Company and its representatives.
- Site inspection and sampling.

California Environmental Protection Agency

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption
For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>



Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Michael Farley
Jervis B. Webb Company
2001-2002 Annual Estimation Letter

- 2 -

June 29, 2001

Statement of Expected Outcome

The following is the expected outcome of work that will be performed during fiscal year 2001/2002:

- Track progress of investigation.
- Written comments on reports to be submitted as appropriate.
- Verify adequacy of reports.

Billing Rates

Enclosed is the billing rate for employees expected to perform the work. The names and classifications of employees that charge time to this site will be listed on the invoices. The average billing rates is approximately \$80.00 per hour.

Estimation of Expected Charges

Board staff expects to charge about 110 hours of work related to this site during fiscal year 2001/2002. Based on the average billing rate of \$80 per hour, the estimated billing charge for this site during fiscal year 2001/2002 is \$8,800.

If you have any questions, please contact Mr. Steven Hariri (213) 576-6745.

Sincerely,



Dennis A. Dickerson
Executive Officer

Enclosure: Billing Rates

Cc: Donna Vercruyssen, SWRCB - CWP

California Environmental Protection Agency

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption
For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>



Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

FAX Transmission

To:	Name	Steven Hariri
	Organization	CA RWQCB
	Mail Stop	
	Fax No.	213-576 6717
	Verification No.	
From:	Name	Eric Yunker
	Address	U.S. Environmental Protection Agency Region 9, Superfund Division 75 Hawthorne Street San Francisco, CA 94105
	Phone No.	415 744 2245
	Fax No.	(415) 744-1796
Date	6-21-01	
No. of Pages (Including Cover)	2	
Subject	Cooper Drum Site	
Note	Final NPL Listing Press Release	



United States
Environmental Protection
Agency

Regional Administrator
75 Hawthorne Street
San Francisco, CA 94105-3901

Region 9
Arizona, California,
Hawaii, Nevada
Pacific Islands



For Immediate Release: June 20, 2001
Contact: Leo Kay, Press Office, 415/744-2201

EPA NAMES SOUTHGATE, CA FACILITY A SUPERFUND SITE

SAN FRANCISCO – The U.S. Environmental Protection Agency finalized the Cooper Drum Facility in South Gate, Calif. as a federal Superfund site late last week, making available federal funds to perform a long-term site cleanup.

From 1941 until 1992, Cooper Drum Co. reconditioned closed-topped, steel drums containing a variety of industrial chemicals. Soil at the 4-acre facility is contaminated with a variety of compounds, including volatile organic compounds. Groundwater beneath the site is also contaminated with volatile organic compounds, including tetrachloroethylene (PCE) and trichloroethylene (TCE).

“This Superfund listing will give us the formal framework and regulatory authority necessary to clean up this site,” said Keith Takata, director of the U.S. EPA’s Superfund program in San Francisco. “With the listing process complete, we can now roll up our sleeves and get to work on devising a cleanup plan.”

The EPA will complete a report that will define the nature and extent of the contamination and evaluate cleanup alternatives – called a “remedial investigation/feasibility study” – before the end of the year.

In 1987, a highly caustic liquid from the facility migrated underground onto the nearby Tweedy Elementary School. Although the soil contamination was cleaned up, the release and additional airborne releases from nearby industrial sites contributed to the school’s closure.

That same year, the city of South Gate closed four municipal wells due to volatile organic compound contamination. Recent investigations have shown that the groundwater contamination beneath the Cooper Drum Site has not impacted the city’s municipal wells. Local municipal wells supply drinking water to approximately 335,000 people.

Cooper Drum is now the 16th Superfund site in Los Angeles County and the 97th in California. There are roughly 1,300 Superfund sites nationwide.

Last week’s listing followed a 60-day public comment period for the proposed listing that began on January 11. The EPA received no comments on the proposal.

###

VISIT OUR HOME PAGE FOR UP-TO-DATE ENVIRONMENTAL NEWS & INFORMATION:
<http://www.epa.gov/region09>



Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Los Angeles Region

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: <http://www.swrcb.ca.gov/~rwqcb4>



MEETING ATTENDANCE SHEET

DATE: 5/31/01

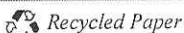
SUBJECT: JERVIS WEBB STATUS MEETING

NAME	ORGANIZATION	PHONE NUMBER
Steven Hariri	RWQCB	213-576-6745
Gary Cronk	IT Corp.	949-660-7511
MIKE SKLASH	DRAGON CORP.	248-932-0228
Michael Feely	Webb	213-891-7895
Mike Farley	Webb	248-553-1201

MEETING NOTE

THEY BELIEVE THAT JERVIS WEBB IS NOT RESPONSIBLE FOR GUN CONTAMINATION AND NO FURTHER INVESTIGATION NEEDED.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

FAX Transmission

To:	Name	Steven HARIRI
	Organization	LA-RWQCB
	Mail Stop	
	Fax No.	213 576 6717
	Verification No.	
From:	Name	Eric Yunker
	Address	U.S. Environmental Protection Agency Region 9, Superfund Division (SFD-7-3) 75 Hawthorne Street San Francisco, CA 94105
	Phone No.	415 744 2245
	Fax No.	(415) 744-1796 or 2180
Date	5-29-01	
No. of Pages (Including Cover)	3	
Subject	COOPER DRUM GW Sampling Results	
Note	Note high levels of TCE AT CPT 12	
	and MW 19 which definitely not coming	
	from COOPER DRUM — Do you have ANY GROUNDWATER Sampling from MacLEOD METALS ?	



COOPER DRUM Co. - Depth Discreet GW SAMPLING

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
SB-3	82	8.1	7.4	<0.5
	82	<1	<1	<0.5
	103	<1	<1	<0.5
	132	<1	<1	<0.5
	151	<1	<1	<0.5

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
CPT-4	61	220	270	<1
	74	<1	<1	<1
	96	<1	<1	<1

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
CPT-12	62	45	12	<1
	73	760	25	<0.6
	99	<1	<1	<1
	125	.8	<1	<1

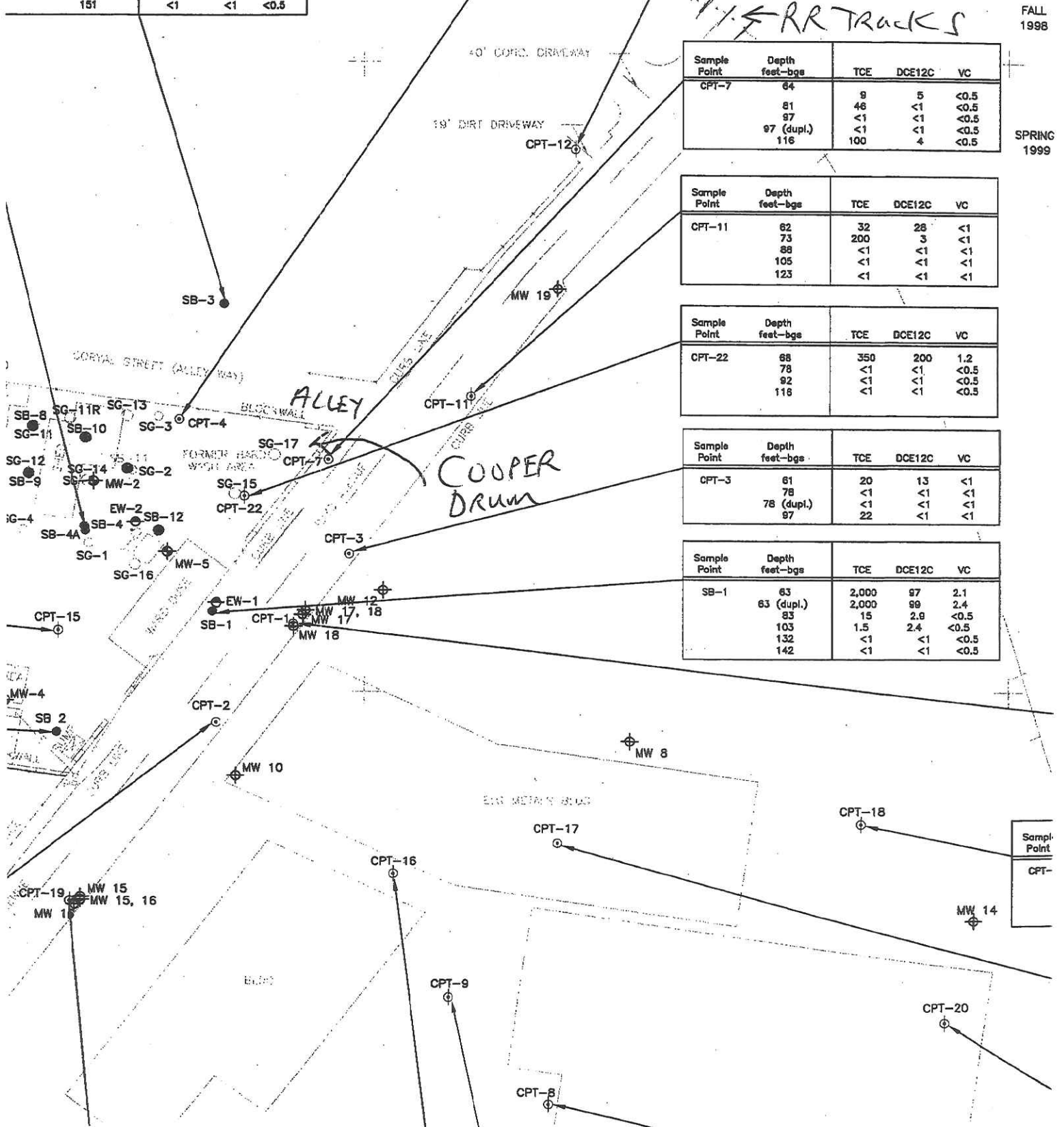
Sample Point	Depth feet-bgs	TCE	DCE12C	VC
CPT-7	64	9	5	<0.5
	81	46	<1	<0.5
	97	<1	<1	<0.5
	97 (dupl.)	<1	<1	<0.5
	116	100	4	<0.5

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
CPT-11	62	32	28	<1
	73	200	3	<1
	88	<1	<1	<1
	105	<1	<1	<1
	123	<1	<1	<1

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
CPT-22	68	350	200	1.2
	78	<1	<1	<0.5
	92	<1	<1	<0.5
	118	<1	<1	<0.5

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
CPT-3	61	20	13	<1
	78	<1	<1	<1
	78 (dupl.)	<1	<1	<1
	97	22	<1	<1

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
SB-1	63	2,000	97	2.1
	63 (dupl.)	2,000	99	2.4
	83	15	2.9	<0.5
	103	1.5	2.4	<0.5
	132	<1	<1	<0.5
	142	<1	<1	<0.5

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CPT-8

CPT-9

CPT-16

CPT-17

CPT-18

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SB-1

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COOPER DRUM Co. - GW Monitoring Well Results - Voc's

Sample Point	Interval feet-bgs	TCE	DCE12C	VC	Sample Date
MW-19	67'-77'	6700	45	1.2	12/13/00
MW-19	67'-77'	5700	33	1.0	2/08/01

Sample Point	Screen Interval feet-bgs	TCE	DCE12C	VC	Sample Date
EW-1 (st)	48.5-88.5'	270	68	1	3/31/99
EW-1 (end)	48.5-88.5'	190	14	<0.5	3/31/99
EW-1 (st)	48.5-88.5'	250	50	1	4/6/99
EW-1 (mid)	48.5-88.5'	120	22	<0.5	4/6/99
EW-1 (end)	48.5-88.5'	140	21	<0.5	4/6/99
EW-1 (primary)	48.5-88.5'	310	100	2.7	8/5/99
EW-1 (dup)	48.5-88.5'	310	100	2.4	8/5/99
EW-1 (dup)	48.5-88.5'	310	100	3	10/6/00

Sample Point	Interval feet-bgs	TCE	DCE12C	VC	Sample Date
EW-2(st)	38.5'-78.5'	200	250	2.8	12/13/00
EW-2(end)	38.5'-78.5'	150	170	1.7	12/13/00
EW-2(st)	38.5'-78.5'	210	200	3.9	03/08/01
EW-2(end)	38.5'-78.5'	130	110	2.4	03/08/01

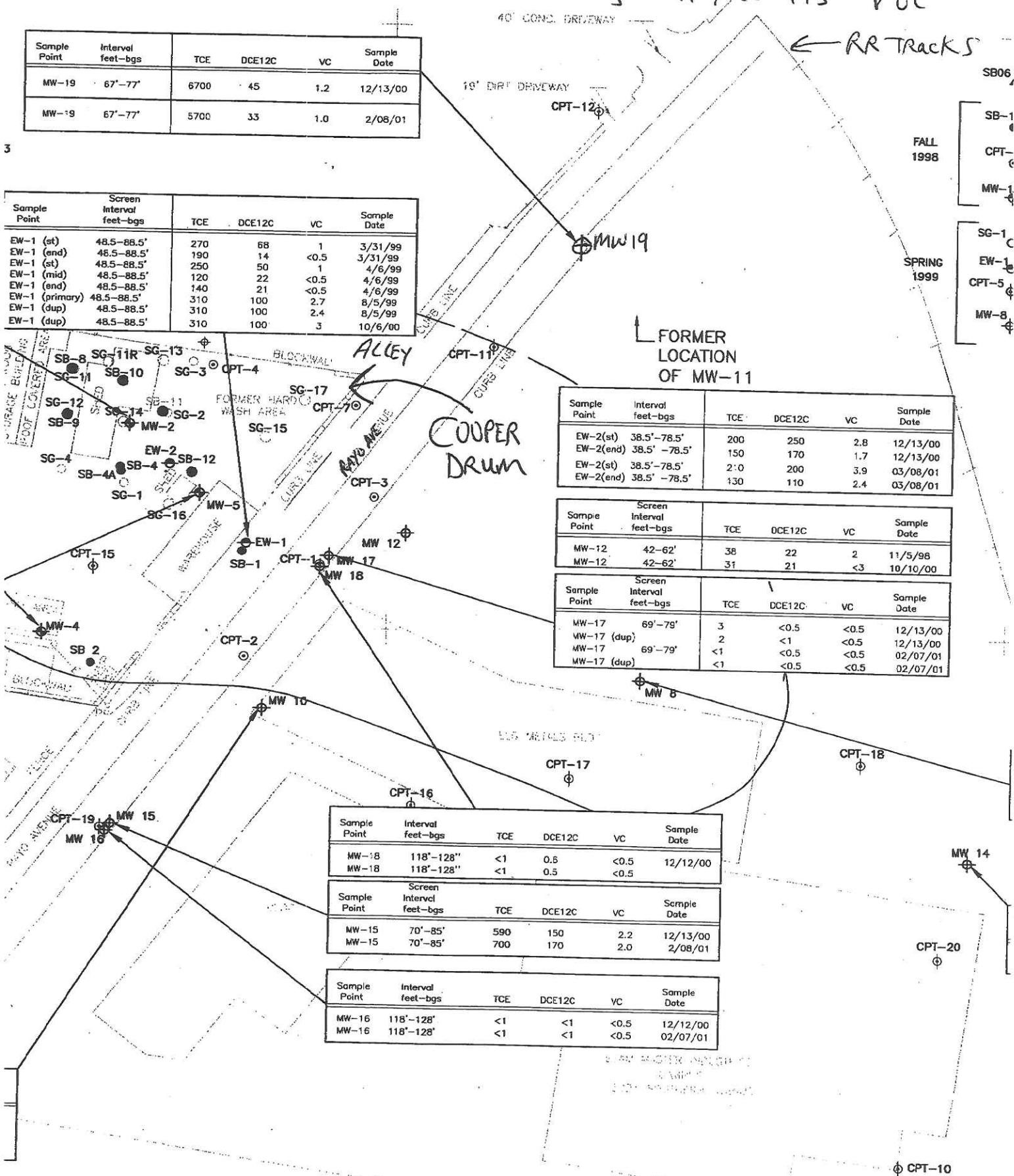
Sample Point	Screen Interval feet-bgs	TCE	DCE12C	VC	Sample Date
MW-12	42-62'	38	22	2	11/5/98
MW-12	42-62'	31	21	<3	10/10/00

Sample Point	Screen Interval feet-bgs	TCE	DCE12C	VC	Sample Date
MW-17	69'-79'	3	<0.5	<0.5	12/13/00
MW-17 (dup)	69'-79'	2	<1	<0.5	12/13/00
MW-17	69'-79'	<1	<0.5	<0.5	02/07/01
MW-17 (dup)	69'-79'	<1	<0.5	<0.5	02/07/01

Sample Point	Interval feet-bgs	TCE	DCE12C	VC	Sample Date
MW-18	118'-128"	<1	0.5	<0.5	12/12/00
MW-18	118'-128"	<1	0.5	<0.5	

Sample Point	Screen Interval feet-bgs	TCE	DCE12C	VC	Sample Date
MW-15	70'-85'	590	150	2.2	12/13/00
MW-15	70'-85'	700	170	2.0	2/08/01

Sample Point	Interval feet-bgs	TCE	DCE12C	VC	Sample Date
MW-16	118'-128"	<1	<1	<0.5	12/12/00
MW-16	118'-128"	<1	<1	<0.5	02/07/01



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LOS ANGELES
MOSCOW
NEW JERSEY

Latham & Watkins

ATTORNEYS AT LAW
WWW.LW.COM

RECEIVED

2001 MAY 23 P 1:52

CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

NEW YORK
NORTHERN VIRGINIA
ORANGE COUNTY
SAN DIEGO
SAN FRANCISCO
SILICON VALLEY
SINGAPORE
TOKYO
WASHINGTON, D.C.

May 23, 2001

VIA MESSENGER

Mr. Steven Hariri
Site Cleanup Unit
California Regional Water Quality Control Board
Los Angeles Region
320 4th Street, Suite 200
Los Angeles, CA 90013

Re: Jervis B. Webb Company of California
5030 Firestone Blvd./ 9301 Rayo Avenue, South Gate, California
RWQCB SLIC File No. 744 (the "Site")

Dear Mr. Hariri:


On behalf of Jervis B. Webb of California, we are submitting two documents concerning the Site. First, we are forwarding two copies of the Quarterly Progress Report for January through March 2001, dated 30 April 2001, prepared by EKI.

Second, as preparation for sale of the Firestone property, IT Corporation and Dragun Corporation conducted an independent, comprehensive review of the hydrogeologic, soil gas, soil chemistry and groundwater chemistry site data. After extensive review of available data, IT/Dragun have concluded that groundwater contamination beneath the Site is not related to Site activities but comes from an upgradient, off-site source. This conclusion is significant, and we are therefore forwarding two copies of the IT/Dragun Groundwater and Soil Evaluation Report dated May 22, 2001 for your review.

As you know, the 5030 Firestone Blvd. property is Webb of California's sole asset and we believe we may be close to a sale of the property. Accordingly, we are requesting a meeting with you and Rebecca Chou to discuss (1) a plan for confirmatory soil sampling as we seek soil closure for the Site and (2) IT/Dragun's analysis of the off-site origin of groundwater contamination under the Site, which we believe strongly supports a conclusion by the Board that Webb of California is not responsible for groundwater contamination under the Site and should not be required to conduct further groundwater investigation or remediation activities at the Site. We will call you next week to schedule a convenient day and time for such a meeting.

Thank you for your continued courtesy.

Yours very truly,


Michael Scott Feeley
of LATHAM & WATKINS

Enclosures



Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Los Angeles Region

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: <http://www.swrcb.ca.gov/~rwqcb4>



Gray Davis
Governor

MEETING ATTENDANCE SHEET

DATE: 2/08/01

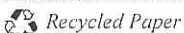
SUBJECT: JENNIS WEBB SITE STATUS

NAME	ORGANIZATION	PHONE NUMBER
Steven Hariri	RWQCB	213-576-6745
RENEECCA CEBU	N	213-576-6733
Michael Feeley	Latham & Watkins	213-891-7895
Michael Farley	Jennis B. Webb	248-553-1201
STEVE CHAMBERS	ERLER & KALINOWSKI, INC.	310-314-8855

MEETING NOTE

BLAKE RIVER COMPANY 1970'S 1960'S JENNIS WEBB
BOUGHT PROPERTIES 1980'S RIVER COMPANY LEFT
AS TENANT. SPENT \$550,000 ON PROPERTIES SO FAR
IN ENVIRONMENTAL COSTS. JENNIS WEBB PAYING FOR
ALL ENV CLEANUP COSTS.
SOIL CLEANUP UNDER & CONFIRMATION PLAN } WILL RESPOND
GW DECONTAMINATION WORK PLAN
RUN GW FOR METALS

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

**Erler &
Kalinowski, Inc.**

Consulting Engineers and Scientists

3250 Ocean Park Boulevard, Suite 385
Santa Monica, California 90405
(310) 314-8855
Fax (310) 314-8860**FACSIMILE TRANSMISSION COVER SHEET**☒ Please Deliver Immediately☐ Hard Copy in the MailDATE: 24 January 2001TIME: 11:15 AMFROM: Steven R. Chambers, Ph.D. *me*PAGES (including cover sheet): 4PROJECT: Webb/South Gate, CAPROJECT #: 991103.00

TO THE FOLLOWING:

NAME: Mr. Steven Hariri

NAME: _____

COMPANY: LARWOCB

COMPANY: _____

FAX NO.: 213-576-6640

FAX NO.: _____

☐ Report☒ As Requested☐ Letter/Memorandum☐ For Approval☐ Specifications☐ For Review and Comments☒ Other☒ For Information and Coordination

MESSAGE:

Mr. Hariri:

The completed AB681 form that you requested for the Jervis B. Webb Company of California site in South Gate, California (RWQCB SLIC File No. 744) is attached. We look forward to meeting with you and Rebecca Chou at 1 PM on 8 February 2001.

Cc: Michael J. Farley, Jervis B. Webb Company

JERVIS B. WEBB COMPANY
Law Department34375 WEST TWELVE MILE ROAD
FARMINGTON HILLS, MICHIGAN 48331-5624**MICHAEL J. FARLEY**
ASSOCIATE GENERAL COUNSELTELEPHONE 1-248-553-1201
FACSIMILE 1-248-553-1292
E-MAIL LAW@JERVISWEBB.COM

January 23, 2001

VIA TELECOPY AND U.S. MAILSteven Chambers, Ph.D.
Erler & Kalinowski
3250 Ocean Boulevard
Suite 385
Santa Monica, CA 90405

Re: California Regional Water Quality Control Board

Dear Steve:

In response to the request from the California Regional Water Quality Control Board, enclosed please find the completed declaration providing information on all current fee titleholders to the Webb of California property located at 5030 Firestone Blvd., South Gate, California. Please submit the form to the Water Quality Control Board on Webb's behalf.

Please call me if you have any questions.

Sincerely,

JERVIS B. WEBB COMPANY

Michael J. Farley
Associate General CounselMJF/sma
Enclosure
IM2132/1454



Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board Los Angeles Region

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: <http://www.swrwb.ca.gov/~rwqcb4>



Gray Davis
Governor

LEAKING UNDERGROUND STORAGE TANK PROGRAM CERTIFICATION DECLARATION FOR COMPLIANCE WITH FEE TITLE HOLDER NOTIFICATION REQUIREMENTS (ASSEMBLY BILL 681)

Please Print or Type

Fee Title Holder(s): Jervis B. Webb Company of California

Mailing Address: c/o Jervis B. Webb Company
34375 West Twelve Mile Road, Farmington Hills, MI 48331-562

Contact Person: Michael J. Farley

Telephone Number / Fax Number: (248) 553-1201 (248) 553-1292

Site Name: Jervis B. Webb Company of California

Address: 5030 Firestone Blvd., South Gate, CA 90280

Contact Person: Michael J. Farley

Telephone Number / Fax Number: (248) 553-1201 (248) 553-1292

File Number: _____

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." (See attached page for who shall sign the Certification Declaration).

Steven F. Hodgkinson
Printed Name of Person Signing

Steven F. Hodgkinson
Signature

Vice President, Treasurer
Official Title

01/23/01
Date Signed

California Environmental Protection Agency

TOTAL P.04

The certification declaration form must be signed as follows:

1. For a corporation - by a responsible corporate officer, which means: (i) by a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy of decision making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million, if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
2. For a partnership or sole proprietorship - by a general partner or the proprietor respectively.
3. For a municipality, state, federal, or public agency - by either a principal executive officer or ranking elected official. A principal executive officer of a federal agency includes (i) the chief executive officer of the agency or (ii) a senior executive officer having responsibility for the overall operations or a principal geographic unit.



California Regional Water Quality Control Board

Los Angeles Region

Winston H. Hickox
Secretary for
Environmental
Protection

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: <http://www.swrqb.ca.gov/~rwqcb4>



Gray Davis
Governor

LEAKING UNDERGROUND STORAGE TANK PROGRAM CERTIFICATION DECLARATION FOR COMPLIANCE WITH FEE TITLE HOLDER NOTIFICATION REQUIREMENTS (ASSEMBLY BILL 681)

Please Print or Type

Fee Title Holder(s): Jervis B. Webb Company of California
c/o Jervis B. Webb Company
Mailing Address: 34375 West Twelve Mile Road, Farmington Hills, MI 48331-562
Contact Person: Michael J. Farley
Telephone Number / Fax Number: (248) 553-1201 (248) 553-1292
Site Name: Jervis B. Webb Company of California
Address: 5030 Firestone Blvd., South Gate, CA 90280
Contact Person: Michael J. Farley
Telephone Number / Fax Number: (248) 553-1201 (248) 553-1292
File Number: _____

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." (See attached page for who shall sign the Certification Declaration).

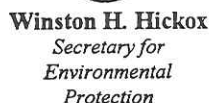
Steven F. Hodgkinson
Printed Name of Person Signing

Steven F. Hodgkinson
Signature

Vice President, Treasurer
Official Title

01/23/01
Date Signed

California Environmental Protection Agency



California Regional Water Quality Control Board
Los Angeles Region

320 W. 4th Street, Suite 200, Los Angeles, CA 90013
Phone (213) 576-6600 FAX (213) 576-6640



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Governor

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> CONFERENCE	<input type="checkbox"/> DISCUSSION <input type="checkbox"/> OTHER (specify) _____	<input type="checkbox"/> FIELD TRIP
TO: <u>Steve Chambers</u> tel	FROM: <u>STEVEN HARPER</u> tel	DATE: <u>1/18/01</u>		
SUBJECT: <u>WORKPLAN FOR SITE</u>		FILE NO: <u>744</u>		
Summary of Conversation:				
<u>2 PM REVIEWED 30 NOV 2000 REPORT FOR SITE CONDITIONS</u> <u>LOCAL HYDROGEOLOGY AND OFFSITE GW PRODUCTION/AND</u> <u>WORKPLAN FOR GW REMEDIATION</u>				
<u>RPT DEFICIENT</u>				
<ul style="list-style-type: none"><u>• NEED GW INVESTIGATION FOR COMPLETE DELINEATION</u><u>• GW MONITORING RPTS MUST INCLUDE ISOCONCENTRATION MAPS</u><u>• LAB REPORTS AND MDL MEET REQ OF RWQCB</u><u>• FILL OUT AND SEND ABLB1 FORM</u>				
<u>SET UP MEETING TO DISCUSS SITE STATUS</u>				
Conclusions, Action taken or required:				
Information copies to:				



California Regional Water Quality Control Board
Los Angeles Region

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[illegible]



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Secretary for
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Protection

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Internet Address: <http://www.swrcb.ca.gov/~rwqcb4>



Gray Davis
Governor

September 18, 2000

Mr. Eli Stanesa
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

QUARTERLY GROUNDWATER MONITORING REPORT – JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD, SOUTH GATE (SLIC NO. 744)

Dear Mr. Stanesa:

The Los Angeles Regional Water Quality Control Board (Regional Board) has received and reviewed the Quarterly Progress Report (report), dated May 15, 2000. Based on review of the information submitted, the Regional Board has the following comments:

1. Submit a work plan for additional groundwater investigation to fully delineate groundwater contamination.
2. Please provide a map showing the proposed locations for additional monitoring wells, tables depicting the analytical methodology, text explaining the rationale for the number and location of additional wells. Direct push technology may be used to delineate groundwater contamination prior to well installation.
3. The Regional Board must be contacted at least 10 days prior to the start of any fieldwork.
4. Contaminated soil and groundwater generated during drilling and water sampling shall be managed in accordance with appropriate regulations.
5. Monitoring well construction and development must comply with the requirements presented in the California Department of Water Resources' "California Well Standards" Bulletin 74-90.
6. A California licensed land surveyor must survey all groundwater monitoring wells to a County maintained benchmark. The survey report, signed by the licensee, shall be included in the assessment report.
7. Future quarterly groundwater monitoring reports must include groundwater contours depicting groundwater flow direction and gradient information. Also, include a dissolved phase contaminant isoconcentration contour map for each constituent.
8. Laboratory reports and method detection limits (MDLs) shall meet the requirements specified in the Regional Board's May 1996 *Interim Site Assessment & Cleanup Guidebook*, Appendices B and C.

California Environmental Protection Agency



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9. We are enclosing the following requirements for your information. All field activities shall comply with these requirements:
- General Requirements for Subsurface Investigation
 - Requirements for Groundwater Investigation
10. Pursuant to State Water Resources Control Board Resolution No. 92-49, under Water Code Section 13304, all fieldwork related to well installation must be conducted by, or under the direct responsible supervision of, a registered geologist or licensed civil engineer. All technical documents submitted to the LARWQCB must be reviewed and signed and/or stamped by a California registered geologist, a California registered certified specialty geologist, or a California registered civil engineer with at least five years hydrogeologic experience.
11. The California Business and Professions Code Sections 6735, 7835, and 7835.1 require that engineering and geologic evaluations and judgements be performed by or under the direction of registered professionals. Therefore, all work must be performed by or under the direction of a registered geologist or registered civil engineer. A statement is required in the report that the registered professional in responsible charge actually supervised or personally conducted all the work associated with the project.
12. Pursuant to changes to the California Health and Safety Code (Section 25299.37.2) and Division 7 of the Porter Cologne Water Quality Control Act under AB 681, the Regional Board is required to notify all current fee title holders for the subject site of the planned action. As the identified current primary or active responsible party for corrective action and/or cleanup at the site, we are requesting that you provide us with a complete mailing list of all record fee title holders for the subject site. Therefore, please provide the name, mailing address, and telephone number for all record fee title holders for the subject site with a copy of the county record of current ownership, available from the County Recorder's Office, or complete the attached Certification Declaration form and submit it to our office. Please submit the required information by the due date of the workplan.
13. You are required to submit information to show the depth to the drinking water aquifer, and a scaled map showing the locations of the production wells and surface water bodies within a one mile radius of the site. The production well information must include the following: the well owner, the well identification number, well construction detail, and the status of the well. In addition, you are required to discuss the local geologic formations and lithology, which will allow this Regional Board to assess the vulnerability of the nearby drinking water supply wells, and determine any potential contaminant migration pathways to deeper groundwater zones. Please include this information along with your upcoming workplan.



Mr. Eli Stanesa
Jervis B. Webb

- 3 -

September 18, 2000

The groundwater investigation workplan must be provided to the Regional Board no later than **November 17, 2000**. In the event that groundwater contamination is not fully delineated during this phase of work, a workplan for a complete groundwater investigation will be required. Please call me at (213) 576-6745, if you have any further questions.

Sincerely,



S. Steven Hariri, P.E.
Associate Water Resources Control Engineer
Site Cleanup Unit I

Enclosures:

1. General Requirements for Subsurface Investigation
2. Requirements for Groundwater Investigation
3. Certification Declaration form

cc: Steven Miller, Erler & Kalinowski, Inc.

California Environmental Protection Agency



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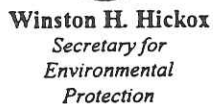
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California Regional Water Quality Control Board
Los Angeles Region

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[illegible]



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Los Angeles Region

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RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> CONFERENCE	<input type="checkbox"/> DISCUSSION <input type="checkbox"/> OTHER (specify) _____	<input type="checkbox"/> FIELD TRIP
TO: DAWN STAUFFER tel ECOLOGY & ENV. (415) 981-2811	FROM: STEVEN HARIRI tel	DATE: 9/5/00		
SUBJECT: SITE STATUS		FILE NO: 744		
Summary of Conversation:				
2:00PM SITE SCREENING FOR EPA FOR PRIORITIZING SITE TO SEE IF EPA NEEDS TO GET INVOLVED / NEED FOR FILING				
SUPERVISOR TM INVOLVED				
GW MONITORING SINCE FEB 98 VAPOR EXTRACTION SINCE MAR 2000 LETTER TO BE SENT OUT SOON TO FULLY DELINEATE GW CONTAMINATION LEADING TO CORRECTIVE ACTION PLAN				
Conclusions, Action taken or required:				
Information copies to:				



Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Los Angeles Region

(50 Years Serving Coastal Los Angeles and Ventura Counties)

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Gray Davis
Governor

June 30, 2000

Mr. Eli Stanesa
Jervis B. Webb Company
34375 W. Twelve Mile Rd.
Farmington Hills, MI 48331-5624

ANNUAL ESTIMATION LETTER FOR SPILLS, LEAKS, INVESTIGATIONS, AND CLEANUP (SLIC) COST RECOVERY PROGRAM – JERVIS WEBB CO. - 5030 FIRESTONE BOULEVARD, SOUTH GATE, SLIC NO. 744 (PCA# 2042J)

Dear Mr. Stanesa:

Section 13304 of the California Water Code (Porter Cologne) allows the Regional Board to recover reasonable expenses from a responsible party for overseeing the investigation and cleanup of unregulated discharges adversely affecting the State's waters. It is our intent to continue to recover costs for regulatory oversight work conducted at this site in accordance with our letter dated February 2, 1998. In compliance with AB 2507, this letter is being sent to provide you with the following information regarding costs for regulatory oversight work:

1. A detailed estimate of the work to be performed or services to be provided.
2. A statement of the expected outcome of that work.
3. The billing rates for all individuals and classes of employees expected to engage in the work.
4. An estimate of all expected charges to be billed to you by this agency.

Estimate of Work to be Performed

Board staff estimate that the following work will be performed during the fiscal year 2000/2001:

- Review groundwater monitoring reports, remediation reports, other project technical reports that may be necessary, and other information as appropriate.
- Provide written correspondences and telephone communications with Jervis B. Webb Company, its representatives and interested third parties.
- Conduct internal communications (i.e. meetings, memos, site status updates, program updates, etc.) regarding the project.
- Meet with Jervis B. Webb Company and its representatives.
- Conduct site inspections and/or collect confirmation samples as appropriate.

California Environmental Protection Agency



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Mr. Stanesa
Jervis Webb Co.

- 2 -

June 30, 2000

Expected Outcome of Work

The followings are the expected outcome of work that will be performed during fiscal year 2000/2001:

- Track progress of remediation.
- Provide written comments on reports to be submitted as appropriate.
- Conduct meetings and/or additional site inspections to facilitate the completion of the project.

Billing Rates

Enclosed is the billing rate for employees expected to perform the work. The names and classifications of employees that charge time to this site will be listed on the invoices. The average billing rate is approximately \$70.00 per hour.

Estimation of Expected Charges

Board staff expects to charge about 110 hours of work related to this site during fiscal year 2000/2001 (July 1, 2000 to June 30, 2001). Based on the average billing rate of \$70.00 per hour, the estimated billing charge for this site during fiscal year 2000/2001 is about \$7,700.

If you have any questions, please contact Steven Hariri at (213) 576-6745.

Sincerely,



Dennis A. Dickerson
Executive Officer
Los Angeles Regional Water Quality Control Board

Enclosure: Billing Rate Description

Cc: Donna Vercruyssen, SWRCB - CWP

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Erler & Kalinowski, Inc.

Consulting Engineers and Scientists

Santa Monica Business Park
2951 28th Street, Suite 1020
Santa Monica, California 90405
(310) 314-8855
Fax (310) 314-8860

28 June 1999

Ms. Ana Veloz-Townsend
Site Cleanup Unit
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Subject: Groundwater Monitoring and Sampling Plan
5030 Firestone Boulevard, South Gate, California
(RWQCB SLIC File No. 744; EKI 961025.02)

Dear Ms. Veloz-Townsend:

On behalf of Jervis B. Webb Company of California ("Webb"), Erler & Kalinowski, Inc. ("EKI") is pleased to submit this project schedule for groundwater monitoring at the Jervis B. Webb Company property located at 5030 Firestone Boulevard in South Gate ("Site"). This schedule has been prepared in response to the request for submittal of a quarterly groundwater monitoring and sampling plan as set forth in the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB") letter to Webb dated 18 May 1999. The proposed groundwater monitoring activities are described in EKI's *Project Tasks, Schedule, and Work Plan for Additional Groundwater Investigation And Quarterly Groundwater Monitoring at the Jervis B. Webb Company Property at 5030 Firestone Boulevard, South Gate, California*, dated 29 September 1998. In our recent telephone conversation, you indicated that a schedule for the activities described in this report would satisfy the RWQCB's requirement.

During the remainder of 1999, EKI proposes to measure the depth to groundwater at the five existing groundwater monitoring wells on a monthly basis. EKI proposes to sample each of the five groundwater monitoring wells once each quarter. The third quarter (July through September) groundwater sampling is planned for August and the fourth quarter (October through December) groundwater sampling is planned for November of 1999. EKI proposes to submit reports detailing these activities approximately one month after the end of each quarter. The next quarterly report will be submitted by the end of July for groundwater monitoring activities completed from April to June 1999.

Letter to Ms. Veloz-Townsend
Regional Water Quality Control Board
28 June 1999
Page 2 of 2

**Erler &
Kalinowski, Inc.**

Please contact us if you have any comments or questions.

Very truly yours,
ERLER & KALINOWSKI, INC.

A handwritten signature in dark ink, appearing to read "Steven G. Miller". The signature is fluid and cursive, with the first name "Steven" written in a larger, more prominent script than the last name "Miller".

Steven G. Miller, P.E.
(CE, Cert. 43419)
Project Manager

cc: Mr. Eli Stanesa, Jervis B. Webb Company



Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Los Angeles Region

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Phone (213) 576-6600 FAX (213) 576-6640
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Gray Davis
Governor

May 18, 1999

Mr. Eli Stanesa
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

JERVIS B. WEBB COMPANY, 5030 FIRESTONE BOULEVARD, SOUTH GATE, SOIL REMEDIATION ACTIVITIES (SLIC NO. 744)

Dear Mr. Stanesa:

We have received and reviewed your consultant's "Work Plan for Clarifier Removal and Soil Remediation by Soil Vapor Extraction" dated April 14, 1999, submitted for the above-referenced site. The report indicates that two distinct soil vadose zones, a shallow zone (approximately 10 to 25 feet bgs) and a deeper zone (approximately 25 to 45 feet bgs), separated by a 1 to 5 foot clay layer at approximately 25 feet bgs exist underlying the subject site. The report also indicates that both zones are impacted by volatile organic compounds (VOC), primarily TCE and PCE, and proposes to remediate the contaminated soil through the use of a soil vapor extraction system (SVE). Your consultant proposes to install three SVE wells and two vacuum monitoring points in the shallow zone and one SVE well and two vacuum monitoring points in the deeper zone. We have reviewed the subject submittal and you are authorized to proceed with the soil remediation activities proposed subject to the following modifications:

1. Upon completion of the pilot testing activities, please provide us with the actual radius of influence data for the SVE wells and revise the site map accordingly. Additional soil vapor extraction wells in both the shallow and deeper zones may need to be installed in order to capture the entire on and off-site soil contamination plume.
2. Your consultant indicates that soil gas samples will be collected immediately after system startup and following the second, fourth, fifth, and sixth months of SVE operation. Soil gas samples should also be collected prior to system startup in order to collect baseline soil gas information.

Regarding the groundwater, as previously indicated in our letter dated September 4, 1998, a quarterly groundwater sampling and monitoring program must be developed for all monitoring wells located at the subject site. A quarterly groundwater monitoring and sampling plan shall be submitted to this Regional Board by **June 28, 1999**. We also recommend that you consider conducting groundwater remediation activities.

California Environmental Protection Agency



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Mr. Stanesa

- 2 -

May 18, 1999

If you have any questions regarding this matter, please contact me at (213) 576-6738.

Sincerely,



ANA TOWNSEND
Sanitary Engineer Associate
Site Cleanup Unit

cc: Steven Miller, Erler & Kalinowski, Inc.

California Environmental Protection Agency



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Erler & Kalinowski, Inc.

Consulting Engineers and Scientists

Santa Monica Business Park

2951 28th Street, Suite 1020

Santa Monica, California 90405

(310) 314-8855

Fax (310) 314-8860

OCT 26 PM 1:13
SOUTH COAST REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

21 October 1998

Ms. Ana Veloz-Townsend
Site Cleanup Unit
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Subject: Transmittal of Results for Additional Groundwater Investigation
and Proposed Well Installation at the Jervis B. Webb Company
Property at 5030 Firestone Boulevard, South Gate, California
(RWQCB SLIC File No. 744; EKI 961025.02)

Dear Ms. Veloz-Townsend:

On behalf of Jervis B. Webb Company of California ("Webb"), Erler & Kalinowski, Inc. ("EKI") is pleased to transmit this summary of results for the recent groundwater investigation and proposal for well installation at the Jervis B. Webb Company property located at 5030 Firestone Boulevard in South Gate ("Site"). The additional groundwater investigation activities were performed in accordance with EKI's, *Project Tasks, Schedule, and Work Plan for Additional Groundwater Investigation and Quarterly Groundwater Monitoring at the Jervis B. Webb Company Property* ("Sampling Plan"), dated 29 September 1998.

Results of PIPP Groundwater Sampling and CPT Investigation

On 1 and 2 October 1998, Holguin, Fahan & Associates, Inc. ("HFA") completed direct-push sampling of groundwater at nine soil boring locations at the Webb property and Reliable Steel Building Products, Inc. ("Reliable Steel") property located at 9301 Rayo Avenue. Samples of groundwater were collected at each location using a Push-in-Plastic-Piezometer ("PIPP"). At one location (CPT-1), groundwater samples were collected at two depths. The locations of these CPT borings are shown on Figure 1, attached. The results of laboratory analyses of groundwater samples are summarized in Table 1.

As proposed in the Sampling Plan, a complete report describing the CPT investigation will be incorporated into a report describing the well installation and quarterly groundwater monitoring activities. This report will be submitted to the RWQCB by 15 December 1998.

Letter to Ms. Veloz-Townsend
Regional Water Quality Control Board
21 October 1998
Page 2 of 2

**Erler &
Kalinowski, Inc.**

Well Installation and Development

We propose to install two new groundwater monitoring wells on the Reliable Steel property. The proposed locations of these wells are shown on Figure 1. In accordance with the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB") letter to Webb dated 4 September 1998, one well (MW-4) will be installed at the south end of the groundwater investigation area, near Rayo Avenue. We also propose to install a well (MW-5) at the northeastern corner of the Reliable Steel Property (see Figure 1).

We currently plan to complete well installation during the last week of October 1998. Well development and groundwater sampling are planned for the first and second weeks of November 1998. Quarterly groundwater monitoring will include sampling of groundwater from the three existing wells at the Site (MW-1 through MW-3) and the two proposed wells.

Please call if you have any questions or comments regarding the above.

Very truly yours,

ERLER & KALINOWSKI, INC.



Steven G. Miller, P.E.
(CE, Cert. 43419)
Project Manager

cc: Mr. Eli Stanesa, Jervis B. Webb Company

TABLE 1
PIPP Groundwater Detections

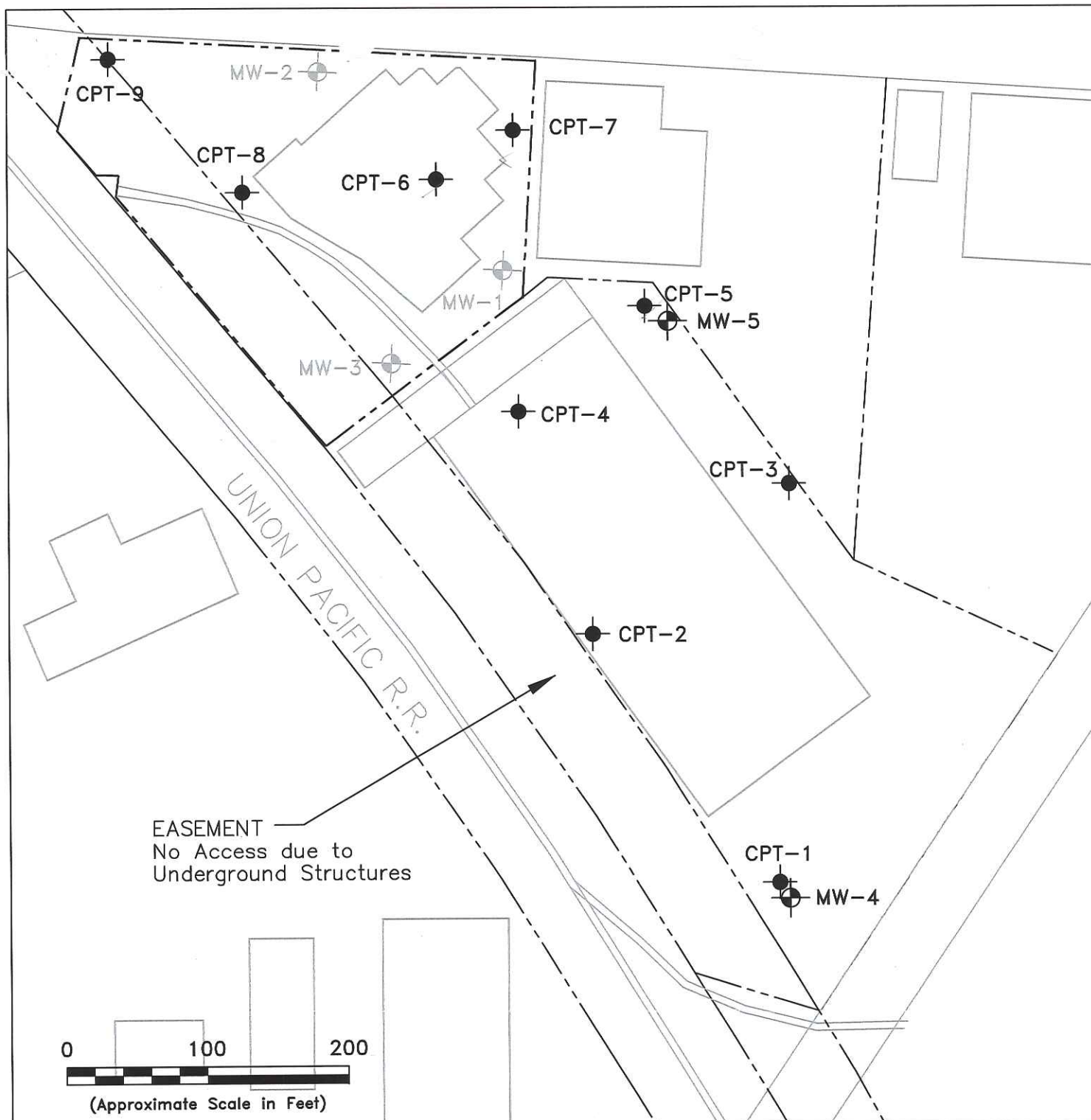
Jervis B. Webb Company
5030 Firestone Boulevard
South Gate, California

PIPP Location	Sample Date	Depth (ft bgs)	Volatile Organic Compounds - EPA Method 8260 (ug/L)											
			Acetone	Ben	1,1-DCA	1,2-DCA	1,1-DCE	c-1,2-DCE	t-1,2-DCE	MEK	PCE	TCE	Tol	Xylenes
CPT-1	10/1/98	55	170	1.6	<0.5	<0.5	<0.5	<0.5	<0.5	4.6	<0.5	<0.5	<0.5	1.6
CPT-1	10/1/98	95	8.1	<0.5	<0.5	5.3	<0.5	<0.5	<0.5	<1	<0.5	<0.5	<0.5	<0.5
CPT-2	10/1/98	55	300	<1	<1	<1	<1	<1	<1	3.5	<1	1.6	1.1	<1
CPT-3	10/1/98	55	170	0.58	<0.5	<0.5	<0.5	2.6	<0.5	2.7	<0.5	6.3	0.55	0.66
CPT-4A	10/1/98	55	95	<1	1.2	<1	4.1	11	<1	2.2	<1	220	1.1	1.2
CPT-4B	10/1/98	55	80	<1	1.1	<1	3.4	10	<1	8.4	<1	200	<1	<1
CPT-5	10/1/98	55	480	<13	<13	<13	<13	110	<13	<25	<13	3,800	<13	<13
CPT-6	10/2/98	55	<400	<100	240	<100	<100	130	<100	<200	110	35,000	<100	<100
CPT-7	10/2/98	55	<500	<125	160	<125	<125	190	<125	<250	<125	27,000	<125	<125
CPT-8	10/2/98	55	16	<0.5	1.4	<0.5	6.7	11	1.3	<1	<0.5	140	<0.5	<0.5
CPT-9	10/2/98	55	490	<1	<1	<1	<1	<1	<1	7.7	<1	9.1	<1	<1

NOTES: Abbreviations:

PIPP = Push-In Plastic Piezometer	c-1,2-DCE = cis-1,2-Dichloroethene
ft bgs = feet below ground surface	t-1,2-DCE = trans-1,2-Dichloroethene
ug/L = micrograms per liter	MEK = Methyl ethyl ketone (2-butanone)
Ben = Benzene	PCE = Tetrachloroethene
1,1-DCA = 1,1-Dichloroethane	TCE = Trichloroethene
1,2-DCA = 1,2-Dichloroethane	Tol = Toluene
1,1-DCE = 1,1-Dichloroethene	Xylenes = Total xylenes
1,2-DCE = 1,2-Dichloroethene (total)	

1. Sample CPT-4B is a duplicate of sample CPT-4A.
2. All results shown are in units of micrograms per liter (ug/L).



LEGEND

- Location of CPT Boring
Installed on 10/1 and 10/2/98
- Proposed Groundwater
Monitoring Well Location
- Existing Groundwater Monitoring Well

Notes:

1. All locations are approximate.

**Erler &
Kalinowski, Inc.**

Site Map Showing Locations
of CPT Borings and Proposed
Groundwater Monitoring Wells

Jervis B. Webb Company
South Gate, CA

October 1998
EKI 961025.02

Figure 1

Erler & Kalinowski, Inc.

Consulting Engineers and Scientists

Santa Monica Business Park
2951 28th Street, Suite 1020
Santa Monica, California 90405
(310) 314-8855
Fax (310) 314-8860

September 29, 1998

Ms. Ana Veloz-Townsend
Site Cleanup Unit
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Verbal
Given on
9/30/98

Subject: Project Tasks, Schedule, and Work Plan for Additional Groundwater Investigation and Quarterly Groundwater Monitoring at the Jervis B. Webb Company Property at 5030 Firestone Boulevard, South Gate, California (RWQCB SLIC File No. 744; EKI 961025.02)

Dear Ms. Veloz-Townsend:

On behalf of Jervis B. Webb Company of California ("Webb"), Erler & Kalinowski, Inc. ("EKI") is pleased to submit this project schedule and work plan for additional groundwater investigation and quarterly groundwater monitoring at the Jervis B. Webb Company property located at 5030 Firestone Boulevard in South Gate ("Site"). This schedule and work plan have been prepared in response to the requirement for submittal of a sampling plan as set forth in the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB") letter to Webb dated September 4, 1998.

PROJECT TASKS AND SCHEDULE

During the next three months, Webb proposes to complete the following tasks:

Task 1 - Additional Groundwater Investigation

The planned additional groundwater investigation consists of a direct-push sampling of groundwater followed by the installation of one or more groundwater monitoring wells. The plan for this work is presented herein below. The target completion date for field and laboratory activities is October 30, 1998. A report describing the results of these investigations will be incorporated into a report with the results of the first quarterly groundwater monitoring. The target date for submittal of this combined report to the RWQCB is December 15, 1998.

Task 2 - Quarterly Groundwater Monitoring

Quarterly groundwater monitoring will include sampling of groundwater from the three existing wells on the Site and new well(s) installed during the additional groundwater investigation. The plan for this work is described below. The first quarter of groundwater monitoring will be performed after completion of the additional groundwater investigation (Task 1) and is currently planned for the first half of November 1998. Thereafter, depth to groundwater measurements will be measured monthly and groundwater sampled and analyzed quarterly at each of Webb's monitoring wells. Depending on sampling results, we may propose to modify the frequency of monitoring activities after the initial two quarters of sampling.

Task 3 - Work Plan for Soil Remediation

EKI will prepare a Work Plan for remediation of soil impacted with volatile organic compounds ("VOCs"). This plan will be submitted to the RWQCB by December 15, 1998. Prior to completion of the plan, Webb proposes to engage a contractor to remove the inactive clarifier at the Site. Clarifier removal is tentatively planned for November 1998. Findings from removal of the clarifier will be presented in the Work Plan for Soil Remediation.

WORK PLAN FOR TASK 1 - ADDITIONAL GROUNDWATER INVESTIGATION

Task 1a – PIPP Groundwater Sampling and CPT Investigation

EKI will subcontract with Holguin, Fahan & Associates, Inc. ("HFA") for completion of direct-push sampling of groundwater at eight locations at the Site. HFA will use its Push-in-Plastic-Piezometer ("PIPP") sampling method to collect groundwater samples near the water table at each location. Subsurface lithologic data will be obtained using Cone Penetrometer Testing ("CPT") at most of these boring locations. At one or more locations, CPT testing will continue to the depth of refusal for the CPT rig to obtain deep lithologic data and to allow collection of a deep grab groundwater sample. Groundwater samples will be analyzed for VOCs using EPA Method 8260.

Task 1b - Well Installation and Development

At least one monitoring well will be installed as required by the RWQCB. This well will be located at the south end of the groundwater investigation area, near Rayo Avenue, as shown on Figure 1. Based on the results of the grab groundwater sampling and analysis in Task 1, Webb may decide to install additional groundwater monitoring well(s) in some of the PIPP groundwater sampling locations. A determination will be made after review of the PIPP investigation results.

Underground Service Alert (Dig Alert) has been notified of the proposed boring locations and subsurface geophysical surveys for underground utilities have already been completed at the Site. Well installation will be performed by West Hazmat Drilling Corporation ("West Hazmat") of Anaheim, California using a hollow-stem auger. Well construction will be performed in accordance with applicable guidelines of the State of California Department of Health Services.

Soil samples will be collected at intervals of approximately five feet from ground surface to the depth of first encountered groundwater at each boring location. The estimated total depth of drilling will be about 70 feet below ground surface ("ft bgs") at each boring. Lithologic classification of soil samples will be logged using the Unified Soil Classification System. The soil samples also will be screened for organic vapors using a field headspace test utilizing a photo-ionization detector.

The groundwater monitoring well(s) will be constructed of 4-inch outer diameter, Schedule 40 PVC casing with 30 feet of slotted screen and a bottom cap. The well(s) will have a 0.010-inch slot-size screen and No. 1C Lone Star sand (or equivalent) will be used for constructing the filter pack in the annular space around the screen. The screen of each well will be positioned approximately 5 feet above the groundwater table to 25 feet below the groundwater table. The filter pack will extend from well bottom to 1.5 to 2 feet above the top of the screen. A 3 to 5 feet thick transition seal consisting of bentonite pellets will be emplaced above the sand pack and hydrated in place. The remainder of each well annulus will be sealed with high-solids bentonite grout from the top of the transition seal to approximately 3 to 5 ft bgs. The top of each well annulus will be sealed with concrete and a traffic box will be installed over the well. Each traffic box will be slightly raised above the surrounding grade to minimize the potential for surface water entering the well. The top of the well casing will be fitted with an expansion cap and locking mechanism.

West Hazmat will perform well development approximately two days following well installation. Well development will be performed in accordance with applicable guidelines of the State of California Department of Health Services. Development will consist of block surging and bailing or pumping. During development, field measurements of pH, temperature, conductivity, and turbidity will be recorded. Development will continue until these parameters appear to stabilize. The new well(s) will be sampled for the first time as part of the first quarterly sampling event.

Downhole drilling and sampling equipment will be decontaminated before each use and at the conclusion of the project. Drilling wastes, development water, and decontamination wastes will be contained in DOT approved 55-gallon drums. These wastes will be temporarily stored on-site pending determination of an appropriate off-site disposal method by Webb.

Following well installation, reference elevations at each groundwater well will be surveyed by Rattray Associates, Inc. of Santa Ana, California. Well surveying will provide a ground surface reference elevation at each well location and the elevation of a top-of-casing reference mark on each well casing.

Task 1c - Report Preparation

EKI will prepare a written report combining the findings of the additional groundwater investigation with the results of the first quarter of groundwater monitoring which is described below. This report will describe observations during the investigation and will include summary tables and graphics, boring and well construction logs, and laboratory reports.

WORK PLAN FOR TASK 2 - QUARTERLY GROUNDWATER MONITORING

Task 2a – Monthly Groundwater Level Measurements

EKI will measure the depth to groundwater in monitoring wells at the Site on approximately a monthly schedule. The depth to groundwater will be measured with an electronic water-level indicator.

Task 2b – Quarterly Collection and Analysis of Groundwater Samples

Before sampling, each well will be purged using an electric submersible pump. A minimum of three well volumes of groundwater will be removed from each well. Well purging will be performed by West Hazmat or other subcontractor. During purging, field measurements of pH, temperature, conductivity, and turbidity will be recorded. Purge water will be contained in DOT approved 55-gallon drums for handling with other investigation-derived wastes.

Groundwater samples will be collected from each well by EKI using a bottom emptying Teflon bailer or disposable bailer. For quality-control purposes, one equipment rinsate blank and one duplicate sample will be collected each quarter. Samples will be contained in 40 milliliter glass bottles. Samples will be labeled with a unique identification number, date and time, placed on ice in a cooler, and transported with chain-of-custody documentation to a laboratory certified by the State of California Department of Health Services. Groundwater samples will be analyzed for VOCs using EPA Method 8260.

Task 2c - Report Preparation

As indicated above, the results of the first quarterly monitoring of groundwater will be presented in a report with the findings of the additional groundwater investigation. For subsequent quarterly monitoring events, a report summarizing the results of groundwater-level

Letter to Ms. Veloz-Townsend
Regional Water Quality Control Board
September 29, 1998
Page 5

**Erler &
Kalinowski, Inc.**

measurements and groundwater sampling and analysis will be prepared and submitted to the RWQCB.

We look forward to your response to this plan.

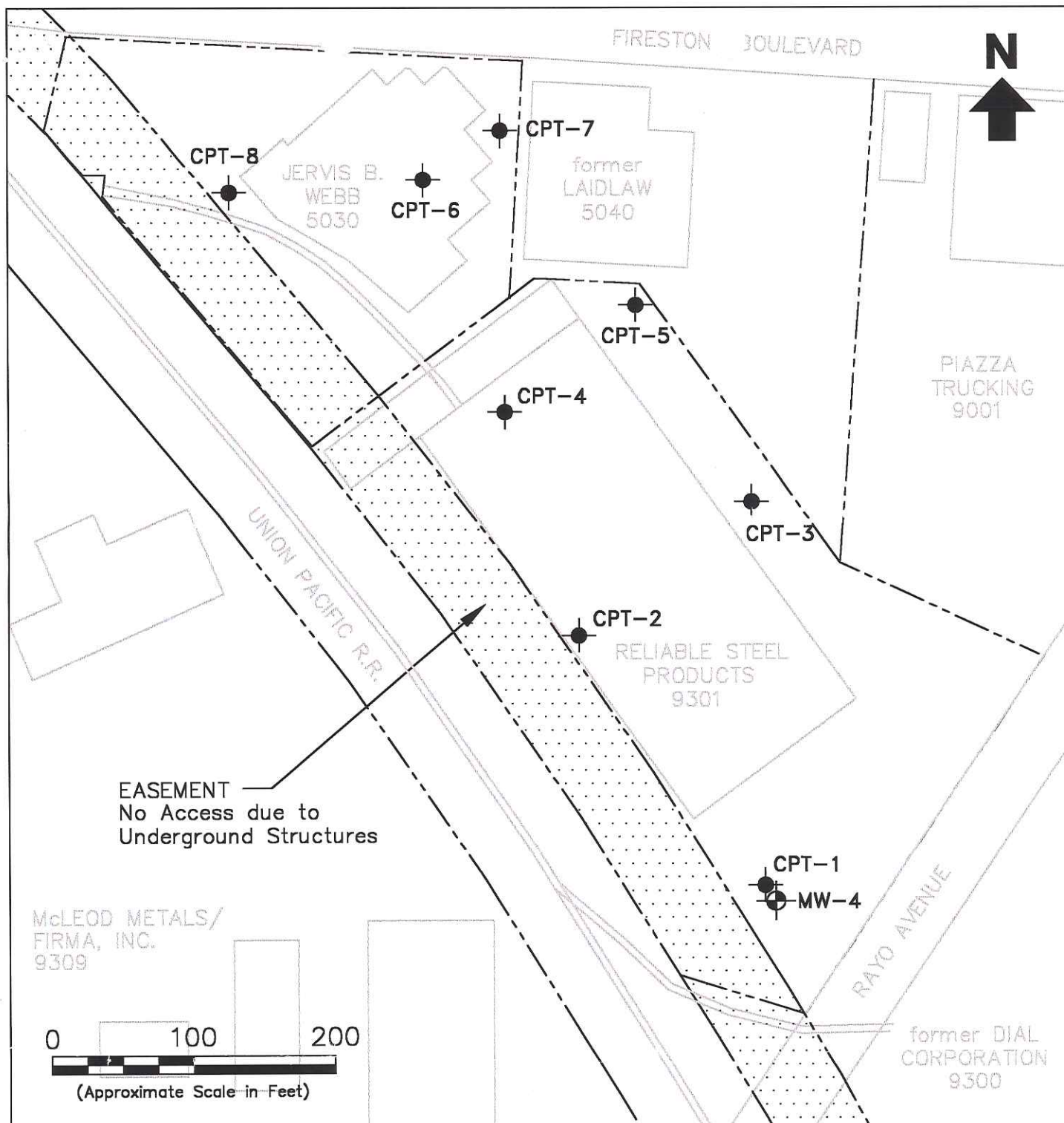
Very truly yours,

ERLER & KALINOWSKI, INC.

A handwritten signature in dark ink, appearing to read "Steven G. Miller". The signature is fluid and cursive, with the first name "Steven" and last name "Miller" clearly distinguishable.

Steven G. Miller, P.E.
(CE, Cert. 43419)
Project Manager

cc: Mr. Eli Stanesa, Jervis B. Webb Company



LEGEND

- Proposed CPT Testing and PIPP Groundwater Sampling Location
- Proposed Groundwater Well Location

Notes:

1. All locations are approximate.
2. PIPP = Push-In Plastic Piezometer

**Erler &
Kalinowski, Inc.**

**Proposed Groundwater
Sampling Locations**

Jervis B. Webb Company
South Gate, California
September 1998
EKI 961025.03

Figure 1



Peter M. Rooney
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Los Angeles Region

Internet Address: <http://www.swrcb.ca.gov>
101 Centre Plaza Drive, Monterey Park, California 91754-2156
Phone (323) 266-7500 • FAX (323) 266-7600



Pete Wilson
Governor

September 4, 1998

Mr. Eli Stanesa
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

JERVIS B. WEBB COMPANY, 5030 FIRESTONE BOULEVARD, SOUTH GATE - ADDITIONAL SITE ASSESSMENT ACTIVITIES (SLIC NO. 744)

We have received and reviewed your consultant's "*Phase II Groundwater Investigation Report*" dated June 30 1998, submitted for the above-referenced site. The report transmits the results from the most recent site assessment activities completed, which includes the results from the installation of the three groundwater monitoring wells and results from soil matrix and groundwater samples collected, from the three new wells and two off-site wells at the subject site.

Analyses of the soil matrix samples collected during previous phases of site assessment activities indicated that soil contaminated with volatile organic compounds (VOC) at concentrations exceeding our cleanup levels have been detected down to the groundwater table, and is considered a continuing threat to the underlying groundwater quality. Groundwater underlies the subject site at approximately 44 feet below ground surface. Analyses of the groundwater samples collected during this phase of site assessment activities from 3 on-site and 2 off-site groundwater monitoring wells have detected VOCs with maximum concentrations of 24,000 µg/L (TCE), 230 µg/L (cis-1,2-DCE) and 160 µg/L (1,1-DCE).

Based on the information submitted to date, we have determined that the concentrations detected in the underlying soil and groundwater exceed allowable levels and that the VOC contaminated soil is a continuing source of groundwater contamination and needs to be remediated. Regarding the groundwater, a quarterly groundwater sampling and monitoring program must be developed for all groundwater monitoring wells located at the subject site. Furthermore, additional groundwater data needs to be collected, primarily up and down-gradient of the source area in order to delineate the extent of the groundwater contamination plume. At a minimum, a groundwater monitoring well shall be installed down-gradient of the source area, preferably near where the former Dial wells were located, in order to monitor the condition of the plume migrating away from the site.

The sampling plan for an additional groundwater investigation, including a schedule for quarterly groundwater sampling and preparation of a workplan for soil remediation activities shall be submitted to this Regional Board by **September 30, 1998**, for our review. The need to remediate the underlying groundwater will be determined following the review and analysis of the additional groundwater data obtained from the well installation and quarterly groundwater sampling activities.

California Environmental Protection Agency



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Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Stanesa

- 2 -

September 4, 1998

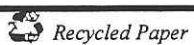
If you have any questions regarding this matter, please contact Ana Veloz-Townsend at (323) 266-7590.

A handwritten signature in black ink, appearing to read "J.E. Ross", with a large, stylized loop at the beginning.

J.E. ROSS, Unit Chief
Site Cleanup Unit

cc: Steven Miller, Erler & Kalinowski, Inc.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.



Peter M. Rooney
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Los Angeles Region

Internet Address: <http://www.swrcb.ca.gov>
101 Centre Plaza Drive, Monterey Park, California 91754-2156
Phone (323) 266-7500 • FAX (323) 266-7600



Pete Wilson
Governor

August 25, 1998

Mr. Eli Stanesa
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

ANNUAL ESTIMATION OF CHARGES FOR SLIC COST RECOVERY PROGRAM - JERVIS B. WEBB COMPANY, 5030 FIRESTONE BOULEVARD, SOUTH GATE, SLIC NO. 744 (PCA #204-2J)

Dear Mr. Stanesa:

The California Water Code (Porter-Cologne), Section 13304, allows the Regional Water Quality Control Board (Regional Board) to recover reasonable expenses from the responsible party for overseeing site investigation and cleanup of unregulated discharges adversely affecting waters of the State. It is our intent to continue to recovery such costs for regulatory oversight work conducted at this site in accordance with our initial Executive Officer letter dated February 2, 1998. In compliance with Assembly Bill 2507, this letter is being sent to provide you with the following information regarding cost for regulatory oversight work:

1. A detailed estimate of the work to be performed or services to be provided.
2. A statement of the expected outcome of the estimated work.
3. The billing rates for all individuals and classes of employees expected to engage in the work or services.
4. An estimate of all expected charges to be billed to you by this agency.

Estimate of Work to be Done

Board staff estimates the following work will be done for your site during the Regional Water Board's 1998/1999 fiscal year:

1. Review the recently submitted Phase II Groundwater Investigation Report dated June 30, 1998.
2. Review Quarterly Groundwater Monitoring and Sampling Reports, probable workplans for further groundwater investigation, soil and groundwater remediation activities and other project technical reports that may be necessary.
3. Attend meetings with representatives of Jervis Webb Company and conduct site inspections to observe implementation of work plans for additional soil and/or groundwater assessment and groundwater monitoring activities and provide written comments as necessary.

California Environmental Protection Agency



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Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations

4. Conduct internal communications (i.e. meetings, memos, etc.) regarding the project.

Statement of Expected Outcome

During the Regional Board's 1997/1998 fiscal year, Board staff reviewed information for this site and approved the work plan to install groundwater monitoring wells and requested Jervis B. Webb to submit a report containing the results of the investigation activities. The following is the expected outcome of work that will be performed during the Regional Board's 1998/1999 fiscal year (which begins July 1, 1998):

1. Provide written comments on the June 30, 1998, report and request for a groundwater monitoring and sampling schedule.
2. Approval of the groundwater monitoring and sampling schedule.
3. Possible conceptual soil and groundwater remediation plans.
4. Evaluate the completeness of the information submitted and provide written comments regarding the need to complete additional assessment and/or remediation activities.

Billing Rates

The attachment "Monthly Salary Scales by Job Classification" is provided for employees expected to engage in the work or services for your facility. The name and classification of employees making charges will be listed on invoices. The average billing rate is approximately \$70 per hour.

Estimate of Expected Charges

Board staff expects to charge approximately 60 hours to your facility during the next fiscal year. Based on the average billing rate of \$70 per hour, the estimated billing charge for the subject site is \$4,200.

If you have any questions concerning the billing procedure, please contact Jim Ross, Site Cleanup Unit chief at (323) 266-7550 or Ana Veloz-Townsend at (323) 266-7590.

Sincerely,



DENNIS A. DICKERSON
Executive Officer

Enclosures

cc: Mr. Rick Remple, SWRCB, CWP

California Environmental Protection Agency



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Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations

Erler & Kalinowski, Inc.

Consulting Engineers and Scientists

Santa Monica Business Park
2951 28th Street, Suite 1020
Santa Monica, California 90405
(310) 314-8855
Fax (310) 314-8860

19 February 1998

Mr. James Ross
Site Cleanup Unit
Los Angeles Regional Water Quality Control Board
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Subject: Transmittal of the Phase II Soil Investigation Report and Background Documents
for the Jervis B. Webb Company Property at 5030 Firestone Boulevard
South Gate, California
(EKI 961025.02)

Dear Mr. Ross:

On behalf of Jervis B. Webb Company of California ("Webb"), Erler & Kalinowski, Inc. is pleased to submit the enclosed Phase II Soil Investigation Report for the property at 5030 Firestone Boulevard in South Gate, California. As we discussed during our meeting on 6 February 1998, Webb requests your review of this investigation pursuant to its agreement with the Regional Water Quality Control Board under the Cleanup and Abatement Cost Recovery Program.

We have also enclosed some background information related to Webb's former property at 9301 Rayo Avenue. The enclosed letter and attachments addressed to Mr. Jim Hansen of the U.S. EPA Region IX, dated 16 January 1997, includes documents describing tank and sump closure work at that site.

We look forward to discussing the findings of the Phase II soil investigation with you. Please call with any comments of questions.

Very truly yours,

ERLER & KALINOWSKI, INC.



Steven G Miller, P.E. (Civil Engineer, Certificate 43419)
Project Manager

cc: Mr. Eli Stanesa, Jervis B. Webb Company

RECEIVED
98 FEB 19 PM 12:03
CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

**Erler &
Kalinowski, Inc.**

Consulting Engineers and Scientists

Santa Monica Business Park
2951 28th Street, Suite 1020
Santa Monica, California 90405
(310) 314-8855
Fax (310) 314-8860

19 February 1996/8

RECEIVED
50 FEB 23 PM 2:00
CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

Ms. Jenny Au
Site Cleanup Unit
Los Angeles Regional Water Quality Control Board
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Subject: Proposed Groundwater Investigations at the Jervis B. Webb Company Property
at 5030 Firestone Boulevard, South Gate in California
(EKI 961025.02)

Dear Ms Au:

On behalf of the Jervis B. Webb Company of California ("Webb"), Erler & Kalinowski, Inc. ("EKI") is pleased to submit this description of proposed groundwater investigations at 5030 Firestone Boulevard in South Gate, California ("Subject Property"). We have prepared this plan pursuant to discussions during our meeting with Mr. Jim Ross and you on 6 February 1998.

SCOPE OF WORK

We propose to install, develop, and sample three groundwater monitoring wells at the Subject Property. These wells will be screened at the static groundwater table, which was encountered at approximately 57 feet below ground surface ("ft bgs") at the site during EKI's October 1997 soil investigation at the Subject Property. The proposed locations are as shown on Figure 1. Underground Service Alert (Dig Alert) has been notified of the proposed boring locations and subsurface geophysical surveys for underground utilities have already been completed at the Subject Property.

Task 1 - Well Installation. Well installation will be performed by West Hazmat Drilling Corporation ("West Hazmat") of Anaheim, California using a hollow-stem auger. Well construction will be performed in accordance with applicable guidelines of the State of California Department of Health Services and Environmental Protection Agency.

Soil samples will be collected at intervals of approximately five feet from ground surface to the depth of first encountered groundwater at each boring location. The estimated total depth of drilling will be about 70 ft bgs at each boring. Lithologic classification of soil samples will be logged using the Unified Soil Classification System. The soil samples also will be screened for organic vapors using a field headspace test utilizing a photoionization detector.

Three soil samples collected from approximately 30 to 50 ft bgs will be retained for chemical analyses. Based on field screening for organic vapors, additional samples may be retained.

Samples of soil will be collected in brass tubes and their ends will be covered with Teflon sheets and plastic caps. Samples will be labeled with a unique identification number, date and time, placed on ice in a cooler, and transported with chain-of-custody documentation to a laboratory certified by the State of California Department of Health Services. Samples of soil will be analyzed as described in Task 3.

The groundwater monitoring wells will be constructed of 4-inch outer diameter, Schedule 40 PVC casing with 20 feet of slotted screen and a bottom cap. We propose that the screen have a 0.010-inch slot size and that No. 1C Lone Star sand will be used for constructing the filter pack in the annular space around the screen. The screen slot and sand pack sizes may be modified based on well construction information from other groundwater monitoring wells in the area, if available. The screen of the well will be positioned approximately 5 feet above the groundwater table to 15 feet below the groundwater table. The filter pack will extend from the well bottom to 1.5 to 2 feet above the top of the screen. A 3 to 5 feet thick transition seal consisting of bentonite pellets will be emplaced above the sand pack and hydrated in place. The remainder of the well annulus will be sealed with high solids bentonite grout from the top of the transition seal to approximately 3 to 5 ft bgs. The remainder of the well annulus will be sealed with concrete and a traffic box will be installed over the well. Each traffic box will be slightly raised above the surrounding grade to prevent surface water from entering the well. The top of the well casing will be fitted with an expansion cap and locking mechanism.

Well development will be performed by West Hazmat no less than two days following well installation. Well development will be performed in accordance with applicable guidelines of the State of California Department of Health Services and Environmental Protection Agency. Development will consist of block surging and bailing or pumping. During development, field measurements of pH, temperature, conductivity, and turbidity will be recorded. Development will continue until these parameters appear to stabilize.

Downhole drilling and sampling equipment will be decontaminated before each use and at the conclusion of the project. Drilling wastes, development water, and decontamination wastes will be contained in DOT approved 55-gallon drums. These wastes will be temporarily stored on-site pending determination of an appropriate off-site disposal method by Webb.

Following well installation, reference elevations at each groundwater well will be surveyed by Rattray Associates, Inc. of Santa Ana, California. Well surveying will provide a ground surface reference elevation at each well location and the elevation of a top-of-casing reference mark on each well casing.

Task 2 - Groundwater Sampling. EKI proposes to sample the three newly installed monitoring wells no less than two days following well development. Prior to sampling, the depth to groundwater will be measured with an electronic water level indicator. Each well will then be purged using an electric submersible pump. A minimum of three well volumes of groundwater will be removed from each well. Well purging will be performed by West Hazmat. During purging, field measurements of pH, temperature, conductivity, and turbidity will be recorded.

Letter to Jim Ross
Regional Water Quality Control Board
19 February 1998
page 3

**Erler &
Kalinowski, Inc.**

Purge water will be contained in DOT approved 55-gallon drums for handling with other investigation wastes.

Groundwater samples will be collected from each well by EKI using a bottom emptying Teflon bailer. For quality control purposes, one equipment rinsate blank and one duplicate sample will be collected. Samples will be contained in 40 milliliter glass bottles. Samples will be labeled with a unique identification number, date and time, placed on ice in a cooler, and transported with chain-of-custody documentation to a laboratory certified by the State of California Department of Health Services.

Task 3 - Chemical Analyses of Soil and Groundwater Samples. We propose to analyze a minimum of three soil samples from each boring. Three soil samples collected from approximately 30 to 50 ft bgs will be analyzed for halogenated volatile organic compounds ("VOCs") using EPA Method 8010. Additional soil samples may be analyzed for halogenated VOCs if significant detections of organic vapors are observed during field screening of other soil samples.

Four samples of groundwater (one from each new well and one duplicate sample), plus one equipment rinsate blank sample, will be analyzed for VOCs using EPA Method 8260.

Task 4 - Report Preparation. After receipt of laboratory reports, EKI will prepare a brief report of findings. The report will include a brief description of observations during the investigation, boring and well construction logs, and laboratory reports.

SCHEDULE

We plan to complete well installation on Tuesday and Wednesday, 24 and 25 February 1998. We expect to develop and sample the wells in the next week. Sample analyses will take approximately two weeks. A report will be complete and submitted to the RWQCB about two weeks after receipt of analytical results, by approximately the end of March 1998.

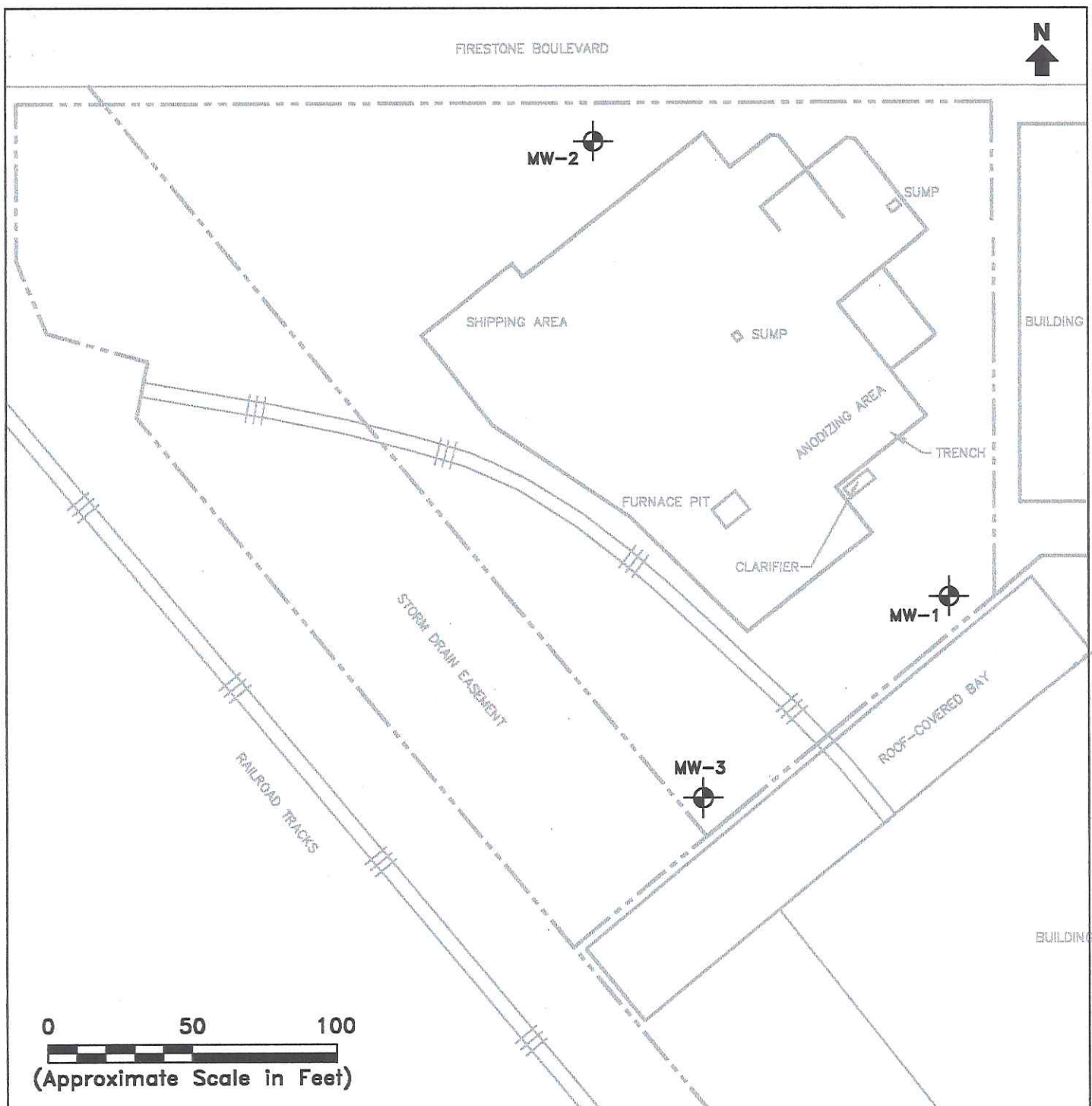
Please call with any comments or questions.

Very truly yours,
ERLER & KALINOWSKI, INC.







Steven G Miller, P.E. (Civil Engineer, Certificate 43419)
Project Manager

cc: Mr. Eli Stanesa, Jervis B. Webb Company



LEGEND

-  PROPOSED SOIL BORING LOCATION
-  PROPERTY LINE/BOUNDARY
-  BUILDING
-  RAILROAD SPUR

Notes:

1. All locations are approximate.

**Erler &
Kalinowski, Inc.**

**Locations of Proposed
Groundwater Monitoring Wells**

Jervis B. Webb Company
South Gate, CA
February 1998
EKI 961025.02

Figure 1



206



Pete Wilson
Governor

Los Angeles
Regional Water
Quality Control
Board

February 2, 1998

101 Centre Plaza Drive
Monterey Park, CA
91754-2156
(213) 266-7500
FAX (213) 266-7600

Mr. Eli Stanesa
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

**SPILLS, LEAKS, INVESTIGATION AND CLEANUP OVERSIGHT COST
REIMBURSEMENT ACCOUNT - JERVIS B. WEBB COMPANY - 5030
FIRESTONE BOULEVARD, SOUTH GATE, CA (SLIC NO. 744)**

Dear Mr. Stanesa:

The California Water Code (CWC), Section 13304, allows the Regional Board to recover reasonable expenses from the responsible party to oversee cleanup of unregulated releases which have adversely affected waters of the State.

The subject site was used as a rivets manufacturing company. A Phase II Site Assessment was conducted and the results show the soil is impacted with various volatile organic compounds. The highest soil contamination found around the clarifier are 140 mg/kg of tetrachloroethene and 270 mg/kg of trichloroethene. The contaminants have exceeded the VOC soil cleanup levels. The released products have threatened to degrade the groundwater quality and the beneficial uses of the State's waters.

Works to be performed by Board staff during fiscal year 1997/1998 include reviewing site assessment workplans and reports, carrying out site inspections, and participating in meetings and conference calls.

The expected outcome of works performed include approval of workplans and corrective action plans.

We estimate that we will spend approximately 110 labor hours per year in the conduct of such oversight. The actual time needed will depend upon the nature and extent of the cleanup and your willingness to accomplish the cleanup in a timely manner. The State billing rate is approximately \$70.00 per hour.

Mr. Eli Stanesa
Page 2

A detailed description of the billing procedure and salary scale are enclosed. We are requesting your acknowledgment of cost recovery obligations to reimburse the State of California for staff oversight by signing and returning the acknowledgment on or before **March 2, 1998**.

If you have any questions concerning the billing procedure, please contact Mr. Jim Ross, Site Cleanup Unit Chief at (213)266-7550 or Ms. Wendy Liu at (213) 266-7530.

Sincerely,



DENNIS A. DICKERSON
Executive Officer

Enclosures

ACKNOWLEDGMENT OF RECEIPT OF
CLEANUP AND ABATEMENT COST RECOVERY LETTER

I, ELI STANESA, acting within the authority vested in me as an authorized representative of JERVIS B. WEBB COMPANY OF CALIFORNIA, a corporation, acknowledge that I have received and read a copy of the attached REIMBURSEMENT PROCESS FOR REGULATORY OVERSIGHT and the cover letter dated February 2, 1998, concerning cost reimbursement for Regional Board staff costs involved with oversight of cleanup and abatement efforts.

I understand the reimbursement process and billing procedures as explained in the letter. Our company is willing to participate in the cost recovery program and pay all subsequent billings in accordance with the terms in your letter and its attachments. I also understand that signing this form does not constitute any admission of liability, but rather only an intent to pay for costs associated with oversight. Billings for payment of oversight costs should be mailed to the following individual and address:

BILLING CONTACT ELI STANESA

BILLING ADDRESS JERVIS B. WEBB COMPANY
34375 W. TWELVE MILE ROAD
FARMINGTON HILLS, MI 48331

TELEPHONE NO. (248) 553-1000

Eli Stanesa
(Signature)

ASSOCIATE GENERAL COUNSEL
(Title)

Date: FEBRUARY 4, 1998

**FACSIMILE
TRANSMISSION
COVERSHEET**

DATE: January 29, 1998 **Total pages including coversheet: 3**

TO: Jenny Au, RWQCB

FAX: 213-266-7668

PHONE: 213-266-7576

RE: Jervis B. Webb (CAD 008 339 467)

FROM: Jeff Inglis
U.S. EPA (SFD-5)
75 Hawthorne Street
San Francisco, CA 94105

FAX: 415-744-1917

PHONE: 415-744-2348

Ms. Au:

This is to follow up on our telephone conversation this afternoon on the above site. Your future contact for this site is Rachel Loftin, at the same address above. Her phone is: 415-744-2347.

Please forward to Rachel a copy of the site sampling plan that EKI submits for your review. She will then respond to you as to what level of information she will need to see from that point on.

Attached is a copy of the letter that we sent out on this site.

A handwritten signature, likely of Jeff Inglis, consisting of stylized initials and a surname.

**Jeff Inglis
R9 Superfund Program**

U. S. ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

February 27, 1997

Mr. Eli Stanesa
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, Michigan 48331-5624

Re: Request for Reassessment of the Jervis B. Webb Company of California
Property at 9301 Rayo Avenue, South Gate, California
EPA ID Number: CAD 008339467

Dear Mr. Stanesa:

EPA is aware that the Jervis B. Webb Company ("Webb") is in the process of trying to sell the property it owns at 9301 Rayo Avenue ("Rayo parcel"). The Rayo parcel, along with the property owned by Webb and located at 5030 Firestone Boulevard ("Firestone parcel"), comprise the property that was the subject of a Preliminary Assessment /Site Inspection conducted by EPA and its contractors. The EPA CERCLIS ID Number for this property is CAD 008339467.

In an effort to facilitate the sale of the Rayo parcel, Webb requested that EPA reassess the Rayo parcel in light of cleanup actions that were recently completed at the Rayo parcel and, if appropriate, remove the site from the active CERCLIS database. On January 16, 1997, Erler & Kalinowski, Inc. ("EKI") submitted a request for reassessment to EPA on behalf of Webb along with documentation regarding the underground storage tank closure activities as well as other general site cleanup work. EPA has reviewed the report submitted by EKI and finds that the work performed in closing the underground tank and in cleaning up the utility trench is satisfactory with respect to the areas of the Rayo parcel addressed by those actions. However, we feel that additional sampling for VOCs should be conducted at both the Rayo and Firestone parcels to address concerns regarding historical solvent usage by Webb..

Pursuant to our review of the Preliminary Assessment/Site Inspection and based on our knowledge of historical operations at the Firestone parcel, EPA would require additional sampling for VOCs in the following areas prior to making any determination with respect to removing the site from the active CERCLIS database: 1) sampling at the location of the hazardous waste storage area on the Firestone parcel; 2) sampling beneath the paved area between the Rayo and Firestone buildings where parts cleaning was formerly conducted; and 3) sampling in the drainage

area to the west of the parts cleaning area. Should you decide to undertake this work, we recommend that you submit a sampling plan to EPA and the California Regional Water Quality Control Board for our review prior to sampling to avoid unnecessary resampling.

EPA remains committed to working with Webb to identify any environmental work that may need to be completed at the Rayo and Firestone parcels prior to "archiving" or removing this site from the active CERCLIS database. If you have any questions regarding this matter, please contact Steve Simanonok of my staff at (415) 744-2358.

Keith Takata

Handwritten signature of Keith Takata in black ink, followed by a horizontal line.

Director
Superfund Division

cc: Steve Miller, EKI (via fax)